



European  
Payments Council

# SEPA Credit Transfer Scheme Rulebook Public Consultation on 2024 Change Requests



EPC006-24 / Version 1.0 / Date issued: 12 March 2024

# Public Consultation on 2024 Change Requests for SCT Scheme Rulebook



European  
Payments Council

European Payments Council AISBL

Cours Saint-Michel, 30 - B - 1040 Brussels

T +32 2 733 35 33

Entreprise N°0873.268.927

secretariat@epc-cep.eu

**EPC006-24**

**Version 1.0**

**Date issued: 12 March 2024**

The European Payments Council (EPC) payment schemes, as set out in the Single Euro Payments Area (SEPA) Credit Transfer (SCT), the SEPA Instant Credit Transfer (SCT Inst), the SEPA Direct Debit Core (SDD Core), the SEPA Direct Debit Business to Business (SDD B2B) and the One-Leg Out Instant Credit Transfer (OCT Inst) scheme rulebooks, evolve based on a transparent change management process adhered to by the EPC. For details on the principles governing the EPC scheme change management process, we refer to sections 5, 6 and 7 in this document and the sources listed at the end of this page.

This SCT 2024 Change Request Public Consultation Document (document EPC006-24) details change requests for possible modifications to be introduced into the next version of the SCT scheme rulebook. This public consultation document builds on change requests submitted by stakeholder representatives, banking communities and by EPC Working and Support Groups. The SCT 2024 Change Request Public Consultation Document offers the analyses and recommendations of the EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG) on the way forward with regard to individual change requests. A summary overview of the change requests and related recommendations by the PSEMWG are provided in section 1 of this Change Request Public Consultation Document.

**The EPC submits the SCT 2024 Change Request Public Consultation Document for public consultation. The public consultation takes place between 12 March and 09 June 2024.**

**All scheme participants and stakeholders are encouraged to provide feedback on the possible changes to be introduced into the next version of the SCT scheme rulebook by completing the response template EPC011-24 and send it to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu) by 09 June 2024 at 17h00 CET at the latest. The EPC will not consider any feedback received after this deadline.**

Proposed changes detailed in this SCT 2024 Change Request Public Consultation Document, which are broadly accepted by all scheme participants and stakeholders, and that are technically and legally feasible, will be taken forward, after approval by the Payment Scheme Management Board (the EPC decision-making body in charge of the schemes' administration and evolution). Others will not be retained. The updated version of the SCT scheme rulebook will be published in November 2024 for implementation in November 2025. In accordance with industry best practice, payment service providers and their suppliers have a 12 months lead time to address scheme rulebook updates prior to such updates taking effect.

More information about the maintenance and the evolution of the SCT scheme is available in Chapter 4 of the [EPC Payment Scheme Management Rules \(the Internal Rules\)](#) being a binding Annex to the current applicable SCT scheme rulebook.

It should be noted that the EPC is under the legal obligation to ensure compliance of the SCT scheme rulebook with existing EU legislations or to any new EU legislation impacting the SCT scheme rulebook.



Therefore, the EPC reserves the right to make necessary changes to the SCT scheme rulebook at all times in order to ensure that the SCT scheme rulebook does comply with changes to existing EU legislation or with the entry into force of any new EU legislation.

Please refer to Annex 1 for the original detailed change requests. This document contains only a summary of each individual change request.



## Table of Contents

<b>1</b>	<b>Executive Summary: Major Change Requests to the SCT Scheme Rulebook</b>	<b>7</b>
1.1	EPC Approach	7
1.2	Overview of Change Requests and Proposed Way Forward for Consideration by Respondents to the Public Consultation	9
1.3	Overview of Changes to Align the Next Version of the SCT Scheme Rulebook with any Existing EU Legislation and with the Entry into Force of New EU Legislation	10
<b>2</b>	<b>Detailed Analysis of Major Change Requests to the SCT Scheme Rulebook</b>	<b>11</b>
2.1	# 01: Change request has been withdrawn	11
2.1.1	Description	11
2.2	# 02: Inclusion of Alias and Proxy Definitions	12
2.2.1	Description	12
2.2.2	PSEMWG analysis and recommendation	12
2.2.3	Rulebook impact	12
2.3	# 04: Change request has been withdrawn	13
2.3.1	Description	13
2.4	# 05: Change request has been withdrawn	14
2.4.1	Description	14
2.5	# 06: Introduction of Hybrid Address of the Payment End-User	15
2.5.1	Description	15
2.5.2	PSEMWG analysis and recommendation	16
2.5.3	Rulebook impact	17
2.6	# 09: Introduce pacs.009 to Replace pacs.008 for Inter-PSP Transactions	18
2.6.1	Description	18
2.6.2	PSEMWG analysis and recommendation	18
2.6.3	Rulebook impact	19
2.7	# 10: Possibility for Beneficiary to return a SCT Transaction after the Amount is Credited	20
2.7.1	Description	20
2.7.2	PSEMWG analysis and recommendation	20
2.7.3	Rulebook impact	20
2.8	# 11: Extension of Character Length for Name	21
2.8.1	Description	21
2.8.2	PSEMWG analysis and recommendation	21
2.8.3	Rulebook impact	21
2.9	# 12: Inclusion of Commercial Trade Name	22
2.9.1	Description	22



2.9.2	PSEMWG analysis and recommendation	22
2.9.3	Rulebook impact	22
2.10	# 13: Inclusion of Reference Party Address	23
2.10.1	Description	23
2.10.2	PSEMWG analysis and recommendation	23
2.10.3	Rulebook impact	23
2.11	# 15: Optional use of Unique End-to-end Transaction Reference (UETR)	24
2.11.1	Description	24
2.11.2	PSEMWG analysis and recommendation	24
2.11.3	Rulebook impact	24
2.12	# 16: Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	25
2.12.1	Description	25
2.12.2	PSEMWG analysis and recommendation	25
2.12.3	Rulebook impact	25
2.13	# 17: Extension of Character Length for Name	26
2.13.1	Description	26
2.13.2	PSEMWG analysis and recommendation	26
2.13.3	Rulebook impact	26
2.14	# 19: Partial Transfer Back of Funds in case of Reason 'Fraud'	27
2.14.1	Description	27
2.14.2	PSEMWG analysis and recommendation	27
2.14.3	Rulebook impact	27
2.15	# 20: Extra Reason Code 'Fraud' for Request For Recall by the Originator (RFRO)	28
2.15.1	Description	28
2.15.2	PSEMWG analysis and recommendation	28
2.15.3	Rulebook impact	28
2.16	# 21: Extension of Character Length for Name	29
2.16.1	Description	29
2.16.2	PSEMWG analysis and recommendation	29
2.16.3	Rulebook impact	29
2.17	# 29: Precisions on Recalls and Status Requests on Recalls	30
2.17.1	Description	30
2.17.2	PSEMWG analysis and recommendation	30
2.17.3	Rulebook impact	30
2.18	# 31: New XML Message Type to Exchange Extra Info between PSPs	31
2.18.1	Description	31
2.18.2	PSEMWG analysis and recommendation	31
2.18.3	Rulebook impact	31



3	Changes Pertaining to the Impact of the SEPA Regulation or any Other EU Legislation	32
4	Detailed Analysis of Minor Changes to the SCT Scheme Rulebook	33
5	Principles Governing the Change Management Cycle	34
5.1	Change Request Public Consultation Document	34
5.2	Structure of the Change Request Public Consultation Document	34
6	Change Management Cycle in respect of Major Change Requests	35
6.1	Consideration of Change Requests	35
6.2	Change Request Public Consultation Document	35
6.3	PSEMWG Recommendations	35
6.4	Public Consultation on the Change Requests	35
6.5	Next Steps	35
6.6	Further Information	36
7	Change Management Cycle in respect of Minor Change Requests	37
7.1	Publication of List of Minor Change Requests	37
7.2	Comments on the Minor Change Requests	37
7.3	Submission of the List of Minor Change Requests to the PSMB	37
	Annex 1 – Original Change Requests	38





## 1 Executive Summary: Major Change Requests to the SCT Scheme Rulebook

### 1.1 EPC Approach

The principles governing the evolution of the EPC payment schemes as set out in the SEPA Credit Transfer (SCT), SEPA Direct Debit (SDD) and the One-Leg Out Instant Credit Transfer (OCT Inst) scheme rulebooks are detailed in the 'EPC Payment Scheme Management Rules' (the Internal Rules). These Internal Rules are available for download on the European Payments Council ([EPC Website](#)). Sections 5, 6 and 7 in this SCT 2024 Change Request Public Consultation Document detail the application of the Internal Rules in the EPC payment scheme change management process.

The Internal Rules make a difference between so called major and minor changes to the EPC scheme rulebooks. A major change is a change that affects or proposes to alter the substance of the scheme rulebooks and the schemes. Any change to chapters 5 and 6 of the scheme rulebooks is always considered a major change. A minor change is a change of an uncontroversial and usually technical nature that facilitates the comprehension and use of the scheme rulebooks.

This executive summary of the SCT 2024 Change Request Public Consultation Document highlights change requests for major changes to the SCT scheme rulebook received in this scheme change management cycle. Change requests for minor changes to the SCT scheme rulebook are set out in section 4 of this Change Request Public Consultation Document. All change requests to the SCT scheme rulebook are submitted for public consultation between 12 March and 09 June 2024. Information on how to share feedback with the EPC is included on the cover page of this Change Request Public Consultation Document.

The EPC received **18** change requests for major changes to be introduced into the SCT scheme rulebook. The change requests submitted to the EPC are included in Annex 1 to this document.

Some change requests suggest amendments to the provision of the type of addresses under the SCT scheme as of November 2025. Currently, the 2023 SCT scheme rulebook specifies that as of November 2025, in case an address is provided, that address must be structured. There are change requests proposing the introduction of a hybrid address as of November 2025 besides the possibility of continuing to use the unstructured address (until November 2026) or the structured address.

Several change requests suggest extending the character length of the name field of the Originator, Beneficiary and their respective reference parties from 70 to 140 characters. There are also suggestions to introduce attributes for the commercial trade names of the Beneficiary and of the Beneficiary Reference Party, and for the address of the Reference Party of the Originator and of the Beneficiary.

One suggestion puts forward the partial transfer back of funds in case of the reason 'Fraud'. Other items propose the optional use of the Unique End-to-end Transaction Reference (UETR).

Another suggestion proposes amendments to the SCT Recall procedure and the related Request for a Status Update on an SCT Recall.

One item suggests the introduction of the Financial Institution-to-Financial Institution ISO 20022-standard based pacs.009 message to replace the pacs.008 message for pure Inter-PSP transactions. A further contribution is the inclusion of the formal definition of the terms 'Alias' and 'Proxy' for which attributes had been introduced in the 2023 SCT scheme rulebook.

One change request concerns the possibility for the Beneficiary to return a SCT transaction after the amount is credited.



One other item proposes adding the reason 'Fraud' for the Request for Recall by the Originator (RFRO) procedure. A final suggestion is to introduce a new XML message type to exchange extra information between PSPs.

All change requests to the SCT scheme rulebook received were reviewed by the EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG). These change requests include the recommendation of the PSEMWG regarding each of these change requests unless the PSEMWG is not able to provide a recommendation for the public consultation. Each recommendation reflects one of the options detailed in items a) through f) below:

- a) The change request is **already provided for** in the scheme: no action is necessary for the EPC.
- b) The change request **should be incorporated into the scheme**: the change request would become part of the scheme and the rulebook would be amended accordingly.
- c) The change request should be included in the scheme as an **optional feature**:
  - The new feature is optional and the rulebook would be amended accordingly;
  - Each scheme participant<sup>1</sup> may decide to offer the feature to its customers, or not.
- d) The change request is **not considered fit for SEPA wide use** and could be handled as an additional optional service (AOS) by interested communities:
  - The proposed new feature would not be included in the rulebook or in the implementation guidelines released by the EPC with regard to the rulebook;
  - The development of AOS is out of scope of the EPC. The EPC does however publish declared AOS arrangements on its website for information;
  - The EPC may consider the inclusion of AOS arrangements, if supported by enough communities, in a future version of the rulebook.
- e) The change request **cannot** be part of the existing scheme for one of the following reasons:
  - It is technically impossible;
  - It is not feasible (explained on a case by case basis);
  - It is out of scope of the EPC;
  - It does not comply with the SEPA Regulation<sup>2</sup> or any other relevant EU legislation.
- f) The change request may be considered for the development of a **new scheme**:
  - The change request reflects major changes which cannot be integrated into an existing scheme;
  - To develop the change request further, i.e. to develop a new scheme, the following requirements must be met:
    - The benefits of the new scheme for payment end users are demonstrated prior to the launch of the development phase;
    - It is demonstrated that enough stakeholders will make use of the new scheme;
    - A cost-benefit analysis is provided;
    - It complies with the SEPA Regulation or any other relevant Regulation.

---

<sup>1</sup> A scheme participant is a payment service provider which has formally adhered to an EPC payment scheme.

<sup>2</sup> Regulation (EU) No 260/2012 establishing technical and business requirements for credit transfers and direct debits in euro and amending Regulation (EC) No 924/2009





## 1.2 Overview of Change Requests and Proposed Way Forward for Consideration by Respondents to the Public Consultation

The below table lists all the received change requests which are submitted for public consultation. The PSEMWG has issued a recommendation on the way forward about each change request. The reasons underlying each recommendation are detailed in section 2. The final decision whether a change request will be incorporated into the rulebook is however subject to the outcome of the public consultation.

**The contributors to this public consultation are requested to indicate whether they agree with the recommendation of the PSEMWG on the way forward.**

**In case the contributors do not agree with the PSEMWG recommendation, they are requested to indicate in the comments section of the response template EPC011-24 their preferred way forward (e.g., support of the original change request, selecting another option).**

**Furthermore, any additional comments are welcome in the comments section.**

Change Request item	Topic	Contributor	Recommendation of the PSEMWG on the proposed way forward. The final decision is subject to the outcome of the public consultation.
01	Change request has been withdrawn	PSEMWG	Change request has been withdrawn
02	Inclusion of Alias and Proxy Definitions	PSEMWG	Should be incorporated into the scheme - option b
04	Change request has been withdrawn	PSEMWG	Change request has been withdrawn
05	Change request has been withdrawn	PSEMWG	Change request has been withdrawn
06	Introduction of Hybrid Address of the Payment End-User	OLO TF and PSEMWG	Should be incorporated into the scheme - option b
09	Introduce pacs.009 to Replace pacs.008 for Inter-PSP Transactions	Nordic Payments Council (NPC)	Cannot be part of the existing scheme - option e
10	Possibility for Beneficiary to return a SCT (Inst) Transaction after the Amount is Credited	Number of French PSPs	Cannot be part of the existing scheme - option e
11	Extension of Character Length for Name	OLO TF and PSEMWG	Should be incorporated into the scheme - option b
12	Inclusion of Commercial Trade Name	PSEMWG	Should be incorporated into the scheme - option b
13	Inclusion of Reference Party Address	PSEMWG	Should be incorporated into the scheme - option b



Change Request item	Topic	Contributor	Recommendation of the PSEMWG on the proposed way forward. The final decision is subject to the outcome of the public consultation.
15	Optional use of Unique End-to-end Transaction Reference (UETR)	Swiss banking community	Cannot be part of the existing scheme - option e
16	Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	Swiss banking community	Cannot be part of the existing scheme - option e
17	Extension of Character Length for Name	Swiss banking community	Should be incorporated into the scheme - option b
19	Partial Transfer Back of Funds in case of Reason 'Fraud'	Spanish banking community	Cannot be part of the existing scheme - option e
20	Extra Reason Code 'Fraud' for Request For Recall by the Originator (RFRO)	Slovak banking association	Cannot be part of the existing scheme - option e
21	Extension of Character Length for Name	Nordic Payments Council (NPC)	Should be incorporated into the scheme - option b
29	Precisions on Recalls and Status Requests on Recalls	BPCE Group	Should be incorporated into the scheme - option b
31	New XML Message Type to Exchange Extra Info between PSPs	Slovak banking association	Cannot be part of the existing scheme - option e

### 1.3 Overview of Changes to Align the Next Version of the SCT Scheme Rulebook with any Existing EU Legislation and with the Entry into Force of New EU Legislation

The contributors to this public consultation are welcome to comment on these changes.

Ref.	Topic	Contributor	Way forward
At this point in time, no items have been identified that require a change to the SCT scheme rulebook due to any EU legislation.			



## 2 Detailed Analysis of Major Change Requests to the SCT Scheme Rulebook

### 2.1 # 01: Change request has been withdrawn

#### 2.1.1 Description

This change request has been withdrawn.



## 2.2 # 02: Inclusion of Alias and Proxy Definitions

### 2.2.1 Description

This change request was made by the PSEMWG.

During the 2022 SCT and SCT Inst scheme rulebook change management cycle held in 2021 and 2022, the 2022 change request to include the Alias and Proxy as optional attributes in both SCT schemes had been accepted.

However, the concerned 2022 change request from the submitting stakeholder did not include concrete definitions for the terms 'Proxy' and 'Alias'. Consequently, such definitions had not been included in the 2023 SCT scheme rulebooks.

In the subsequent review and finalization of the Risk Management Annexes (RMAs) being an integral part of the two 2023 SCT scheme rulebooks, definitions for the two terms had been taken up in these RMAs. However, the distribution of the RMAs is restricted to only the SCT (Inst) scheme participants and scheme applicants.

Therefore, the suggestion is to insert the 'Proxy' and 'Alias' definitions from these RMAs in the SCT scheme rulebooks. In this way, also the other stakeholders have the same understanding about what is concretely meant with the terms 'Proxy' and 'Alias' in the SCT scheme rulebooks.

### 2.2.2 PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**.

### 2.2.3 Rulebook impact

If this change request is supported, this will impact the rulebook only.



## 2.3 # 04: Change request has been withdrawn

### 2.3.1 Description

Change request has been withdrawn.



## 2.4 # 05: Change request has been withdrawn

### 2.4.1 Description

This change request has been withdrawn.





## 2.5 # 06: Introduction of Hybrid Address of the Payment End-User

### 2.5.1 Description

This change request was made by the OLO TF and the PSEMWG.

#### Past EPC decision

The March 2022 EPC Scheme Management Board (SMB) meeting approved the 2022 change request item #06 to exclusively use the structured address of the customer as of November 2025. This change would affect all four SEPA payment scheme rulebooks.

As of 19 November 2023<sup>3</sup>, customers would be allowed to send in a structured way their own address and/or the address of their payment counterparty in electronic Customer-to-PSP files at least when based on the corresponding EPC payment scheme Customer-to-PSP IGs.

One element the EPC took into account for its decision was that with the exclusive use of structured addresses as of November 2025, the SEPA payment schemes would be aligned with the deadline set for the use of the structured address under the Cross-border Payments and Reporting Plus (CBPR+) and High Value Payments Plus (HVPS+) usage guidelines.

When the OCT Inst scheme rulebook was published in 2023, it also included the exclusive use of a structured address as of November 2025.

#### Developments within SWIFT

The December 2023 SWIFT Board meeting decided to adapt its address specifications for the SWIFT Standard Release 2025. SWIFT decided to

- Step back from its initial decision to allow only structured addresses as of November 2025;
- introduce a **hybrid address** version by November 2025 alongside a structured address version with the hybrid address version having no expiration date; and
- Allow the unstructured address version until November 2026 (22 November 2026).

The **hybrid address** concerns a mix of structured and unstructured address details. It allows the combination of structured ISO 20022 address elements **and** up to **two** lines of 70 characters of unstructured “Address Line” <AdrLine>. Elements available in structured format must be mapped into the respective structured elements. The structured elements for “Country” <Ctry> and for “Town Name” <TwnNm> will become mandatory. Structured elements cannot be repeated in the <AdrLine> elements.

#### Re-consideration of earlier EPC decision

The EPC Payment Scheme Management Board (PSMB) re-considered the EPC decision taken back in March 2022. It is now in favour of the introduction of the hybrid address alongside the structured and the unstructured addresses in all five EPC payment schemes having in mind the following elements:

- A migration from unstructured addresses directly to fully structured addresses is a true challenge for payment end users and PSPs, especially given the current deadline of November

---

<sup>3</sup> This date was later postponed to 17 March 2024 due to the EPC decision on 24 October 2023 to postpone the ISO version migration for all four 2023 SEPA payment scheme rulebooks to 17 March 2024.



2025 for SEPA transactions. The time needed to change the addresses in all customer databases or to move to databases capable of supporting structured addresses, would be long.

- For customers making SEPA, high value and international payment transactions, an alignment of the address structure between the three groups of payment instruments would be the best;
- Only the structured address fields 'Town' and 'Country' are needed for regulatory screening.

### 2.5.2 PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025** as follows:

1. Since the 2023 SEPA payment scheme rulebooks, payment end users and payment scheme participants are already allowed to provide fully structured addresses in their respective electronic Customer-to-PSP files and inter-PSP payment messages and r-transactions.

The provision of fully structured addresses remains supported under the 2025 SEPA payment scheme rulebooks as well.

This means that all scheme participants must continue to support the delivery of structured addresses when payment end users and scheme participants want a structured address in their outgoing and incoming SEPA payment transactions. Scheme participants cannot reject SEPA payment transactions only due to the inclusion of a structured address.

2. As of the entry-into-force date of the 2025 SEPA payment scheme rulebooks being 16 November 2025, payment end users are allowed to send a **hybrid address** of the payer and/or of the payee in electronic Customer-to-PSP files at least based on the Customer-to-PSP Implementation Guidelines for SEPA payment transactions.

From that same date, also SEPA payment scheme participants are allowed to provide hybrid addresses in their inter-PSP SEPA payment messages and r-transactions.

As of 16 November 2025, all scheme participants must also be able to support the delivery of hybrid addresses when payment end users and scheme participants want a hybrid address in their outgoing and incoming SEPA payment transactions. From this date, scheme participants cannot reject SEPA payment transactions only due to the inclusion of a hybrid address.

3. As of the entry-into-force date of the 2025 SEPA payment scheme rulebooks being 16 November 2025 up to 22 November 2026, payment end users and scheme participants are allowed to continue providing unstructured addresses in their respective electronic Customer-to-PSP files and inter-PSP SEPA payment messages and r-transactions.

In the period November 2025 – November 2026, all scheme participants must continue to support the delivery of unstructured addresses when payment end users and scheme participants want an unstructured address in their outgoing and incoming SEPA payment transactions. Scheme participants cannot reject SEPA payment transactions only due to the inclusion of an unstructured address.

As of 22 November 2026, the use of an **unstructured** address will **no longer be allowed and will hence lead to rejects**. Only hybrid and structured addresses will be allowed from that date onwards.

The EPC nevertheless recommends that scheme participants and their customers to use the time up to November 2026 in which unstructured addresses can still be submitted (compared to initially



November 2025), as an opportunity to start right away with the switch from unstructured addresses directly to fully structured addresses.

The use of structured addresses in payment transactions, gives the potential to reduce errors in payment processing, regulatory screening, and reconciliation, thereby increasing the straight-through-processing of SEPA payment transactions.

During the transition period up to November 2026 in which payment end users and scheme participants can start to move to the use of hybrid or preferably structured addresses, the current input of addresses with 2 occurrences of the unstructured address element “Address Line” associated with the structured address element “Country” will continue to be accepted.

### 2.5.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.



## 2.6 # 09: Introduce pacs.009 to Replace pacs.008 for Inter-PSP Transactions

### 2.6.1 Description

This change request was made by the Nordic Payments Council (NPC).

The contributor suggests introducing a pacs.009 message that can replace the pacs.008 used for inter-PSP transactions such as fees and interest compensation. A pacs.009 could be used for other Inter-PSP transactions as well (not only fees and interest compensations).

The use of an adjusted Customer Credit Transfer (pacs.008) is not aligned with the ISO 20022 standard. According to this standard, a pacs.009 should be used to settle in a correct way pure FI-to-FI payments. This change request is in line with a requirement defined by the Committee on Payments and Market Infrastructure (CPMI)<sup>4</sup>:

#### Requirements Block A – Fundamentals

2.5.1 Requirement #1 – To use the appropriate message for a particular business function

##### Background and rationale

While ISO 20022 has defined the scope and business function for each message, there is some risk of inconsistent use of messages or deviation from the actual scope defined for that message. This can undermine processing efficiency. For example, instead of implementing the ISO 20022 message for return payments (ie the pacs.004), certain markets choose to use a regular credit transfer message (eg pacs.008 or pacs.009) with customised, proprietary codes to identify this "new" payment as a return payment. This inconsistent use requires financial institutions participating in different markets and/or across multiple solutions to perform the same business function in different ways. This is done by using customised, rather than standardised, message implementations to identify the actual message function of a message, as opposed to the one expected per the message scope.

##### Proposed solution

The CPMI proposes to require use of ISO 20022 messages identified as part of the core set for cross-border payments in line with their scope as defined by the ISO 20022 standard.

### 2.6.2 PSEMWG analysis and recommendation

The PSEMWG recommends not taking forward the change request (**option e**). There were several reasons why the EPC opted for not introducing pacs.009 for the SCT inquiry procedure whereby inter-PSP fees and interest compensations paid between PSPs are done via a pacs.008:

- The introduction of such new pacs. message is a huge work for PSPs and CSMs. At that time of introducing the SCT inquiry procedure, the number of inter-PSP payments for inter-PSP fees and for interest compensations under the SCT scheme was expected to be low;
- It only makes sense when the introduction of pacs.009 can be justified with a convincing level of expected transaction volume;
- The EPC wanted to keep the link between the initial SCT transaction and the inter-PSP payment for an inter-PSP fee/interest compensation related to that SCT transaction.

In addition, a pacs.009 transaction is not a commercial payment but is normally treated via High-Value-Payment infrastructures such as T2. The PSEMWG is also unsure whether low-value high-volume retail payment CSMs would be willing to handle FI-to-FI payments as well.

---

<sup>4</sup> Committee on Payments and Market Infrastructures Consultative report on ISO 20022 harmonization requirements for enhancing cross-border payments, March 2023 (BIS)



### 2.6.3 Rulebook impact

If this change request is supported, this will impact the rulebook and the inter-PSP implementation guidelines.



## 2.7 # 10: Possibility for Beneficiary to return a SCT Transaction after the Amount is Credited

### 2.7.1 Description

This change request was made by a number of French PSPs.

These French PSPs suggest giving the possibility for a Beneficiary to return a SCT transaction after the amount of the initial SCT transaction has been credited on the account of the Beneficiary, i.e. to allow a Return R-transaction reason “return by order of the Beneficiary” for the SCT scheme rulebook.

Currently, in case the Beneficiary receives funds but it does not recognize the SCT transaction or the Originator, it cannot make a Return for the credited funds.

The only possibility the Beneficiary has is to give a Return instruction to the Beneficiary PSP in case of an SCT transaction before the funds are credited on the account of the Beneficiary.

Most of the time, the Beneficiaries will only be able to contest the transaction based on their account statement (i.e. after funds have been credited).

In the change request, the contributors also provide several use cases in which the use of the SCT Return R-transaction “Return by order of the Beneficiary” can be useful.

Finally, for the Return reason “Return by order of the Beneficiary”, the contributors suggest extending the current SCT Return period of three banking business days after settlement date to e.g., an eight weeks period (which will allow natural persons receiving their statement account once a month to react and express their request for a Return) or to 13 months (in accordance with the PSD2 timeframe to reimburse a non-authorized transaction).

### 2.7.2 PSEMWG analysis and recommendation

The PSEMWG recommends not taking forward the change request (**option e**).

This change request is a fundamental change to the SCT scheme as the SCT transaction credit is final. It would change the legal nature of the transaction as currently the transaction becomes final once credited on the account of the Beneficiary. If the Beneficiary wants to send back the funds, it then must create a new transaction.

The Beneficiary PSP can offer solutions to the Beneficiary to transfer back the funds in case e.g., the Beneficiary does not have the IBAN of the Originator at its disposal (in some SEPA countries, this IBAN is not shared with the Beneficiary). Furthermore, such solutions are part of the Customer-to-PSP space where commercial forces are at play.

### 2.7.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.





## 2.8 # 11: Extension of Character Length for Name

### 2.8.1 Description

This change request was made by the OLO TF and the PSEMWG.

The SEPA length of characters is currently set at 70 characters for the name fields for the following attributes under the SCT scheme rulebook: Originator (AT-P001), Originator Reference Party (AT-P006), Beneficiary (AT-E001) and Beneficiary Reference Party (AT-E007).

It suggests extending the character length for the 'Name' field for the SCT scheme **for all upper-mentioned attributes** from 70 to 140 characters as:

- The 2019 ISO 20022 standard foresees up to 140 characters for the 'Debtor', 'Ultimate Debtor', 'Creditor', 'Ultimate Creditor' and 'Financial Institution' name fields.
- The provision of extra characters allows payment service users to enter the complete name(s) concerned. This avoids the issue of data truncation and can provide the payment service user with further transparency about the identity of the payment counterparty and/or its reference parties and the financial institution(s) involved.
- The possibility to provide the complete name(s) can support PSPs with respect to regulatory screening and up-front verification of payment counterparty names (such as Confirmation of Payee).
- The Cross-border Payments and Reporting Plus (CBPR+) specifications also allow 140 characters for these name fields.

This proposed change does not impact the SCT scheme rulebook itself, but only its related Customer-to-PSP and inter-PSP implementation guidelines.

**Important: if the 2024 change request item #12 (see section 2.11 in this document) on the inclusion of the commercial trade name would be supported, the maximum length of the commercial trade name could become 140 characters as well (depending on the final message element selected to transport the commercial trade name).**

### 2.8.2 PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**.

### 2.8.3 Rulebook impact

If this change request is supported, this will only impact the Customer-to-PSP and the inter-PSP implementation guidelines.



## 2.9 # 12: Inclusion of Commercial Trade Name

### 2.9.1 Description

This change request was made by the PSEMWG.

The [Statement](#) of the June 2021 Euro Retail Payments Board (ERPB) meeting endorsed a [set of recommendations](#) formulated by the ERPB working group on transparency for retail payment end-users.

One recommendation assigned to payment schemes such as the EPC payment schemes relates to the commercial trade name i.e. recommendation id 01: *Consistently use commercial trade name and provide this name to all involved parties in the payment chain for use in client's payment account statements.*

Furthermore, the commercial trade name is referred to in Article 25 'Information for the payer on individual payment transactions' of the proposed Payment Services Regulation (PSR), and in Article 2 (1c) of the amended SEPA Regulation.

The PSEMWG analysed to what extent the existing EPC payment scheme attributes suffice to meet the identified need or whether additional attributes would be needed.

Following this analysis, new attributes related to the "whom" are proposed being **yellow optional** fields in the relevant payment scheme implementation guidelines. As a yellow optional field, all scheme participants must support this ISO message element throughout their SEPA payment systems even though payment service users would still be free to use these elements or not.

### 2.9.2 PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**.

### 2.9.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.



## 2.10 # 13: Inclusion of Reference Party Address

### 2.10.1 Description

This change request was made by the PSEMWG.

The [Statement](#) of the June 2021 Euro Retail Payments Board (ERPB) meeting endorsed a [set of recommendations](#) formulated by the ERPB working group on transparency for retail payment end-users.

One aspect for which transparency can be improved is about the reference parties of the payer and of the payee.

The SEPA payment scheme rulebooks currently support only the exchange of the name and an identification code of such reference parties. The proposal is to also allow the exchange of the address of such reference parties. Payment end-users would no longer have to use other fields (such as the remittance information field) to provide such address data. It also allows better regulatory processing of such reference party data.

New attributes are proposed being **yellow optional** fields in the relevant payment scheme implementation guidelines. As a yellow optional field, all scheme participants must support this ISO message element throughout their SEPA payment systems even though payment service users would still be free to use this element or not.

**Important: the proposed specifications to be followed to complete such addresses are aligned with the specifications proposed for the 2024 change request item #06 (see section 2.6 in this document).**

**Subject to the final decision by the Payment Scheme Management Board (PSMB) for item #06, the proposed address specifications for the reference parties may remain unchanged or may be adapted accordingly.**

### 2.10.2 PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**.

### 2.10.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.



## 2.11 # 15: Optional use of Unique End-to-end Transaction Reference (UETR)

### 2.11.1 Description

This change request was made by the Swiss banking community.

The contributor suggests **the option** for scheme participants to transmit the Unique End-to-end Transaction Reference (UETR) for an SCT transaction. The use of the UETR simplifies backend processes.

### 2.11.2 PSEMWG analysis and recommendation

The PSEMWG recommends not taking forward the change request (**option e**). The members of the PSEMWG are not aware of any concrete demand from the market for having the UETR in the SCT scheme.

Some stakeholders could see a potential benefit for the SCT scheme. But with the EU Instant Payments Regulation coming into force imposing PSPs in the EEA to offer instant euro credit transfers, the SCT Inst scheme may well overtake the SCT scheme in a few years' time. Therefore, the PSEMWG doubts whether it still makes sense to foresee the UETR in the SCT scheme.

### 2.11.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.



## 2.12 # 16: Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space

### 2.12.1 Description

This change request was made by the Swiss banking community.

This change request is linked to the potential change of the implementation of the structured address. If the hybrid address is **not** introduced or another decision is taken in regards of the structured address (e.g., postponement to a later change cycle), this change request becomes obsolete.

#### Preliminary explanation:

Based on the section 0.5.1 ‘SCT Scheme Implementation Guidelines’, the implementation guidelines are binding in the Customer-to-PSP space. Most Swiss PSPs have already implemented the structured address based on the currently valid definition in their offering and internal applications. While in the inter-PSP space the handling of the address must be anyway less strict (e.g., supporting cross-border payments via SWIFT, bank-to-bank payments, cash-legs of other types of transaction), the rules in the Customer-to-PSP space are often implemented more restrictively.

#### Change request in case the content of the address of the involved parties was changed from structured to hybrid:

The hybrid address becomes only mandatory in the inter-PSP space. In the Customer-to-PSP space, the respective PSP is not obliged to support the hybrid address and can restrict its offering to structured address only.

### 2.12.2 PSEMWG analysis and recommendation

The PSEMWG recommends not taking forward the change request (**option e**). Reference is made to the change request item # 06 (see section 2.6 in this document) as submitted by the OLO TF and the PSEMWG.

The change request item # 06 allowing payment service users to submit hybrid addresses (if they wish so) as of November 2025, is an alignment with the SWIFT Standard Release 2025 for the Cross-border Payments and Reporting Plus (CBPR+) usage guidelines. The suggestion is to include this hybrid address possibility in the SCT Scheme Customer-to-PSP Implementation Guidelines (IGs) which each Originator PSP is obliged to support at the request of the Originator. The section 0.5.1 of the SCT scheme rulebook points out that these IGs are **binding** supplements for the SCT scheme participants.

### 2.12.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.



## 2.13 # 17: Extension of Character Length for Name

### 2.13.1 Description

This change request was made by the Swiss banking community.

The contributor suggests extending the character length for the relevant 'Name' fields under the SCT scheme, from 70 to 140 characters.

This proposed change does not impact the SCT scheme rulebook itself, but only its related Customer-to-PSP and inter-PSP implementation guidelines.

### 2.13.2 PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**. This change request has the same goal as the change request item # 11 (see section 2.10 in this document).

### 2.13.3 Rulebook impact

If this change request is supported, this will only impact the Customer-to-PSP and the inter-PSP implementation guidelines.





## 2.14 # 19: Partial Transfer Back of Funds in case of Reason 'Fraud'

### 2.14.1 Description

This change request was made by the Spanish banking community.

To contribute to a better recovery of funds due to of fraudulently initiated SCT transactions, the contributor proposes the adoption of a specific procedure for a partial transfer back of funds for those cases in which the account of the Beneficiary does not contain sufficient funds to fully meet a Recall request for the reason 'Fraud' (reason code 'FRAD').

When the Beneficiary PSP determines that there are not enough funds on the account of the Beneficiary to fully honour the Recall request, it should then:

- Respond negatively to the Recall request for 'FRAD' reasons, indicating the reason code for this negative response i.e. 'AM04 – insufficient funds'.
- Subsequently, re-imburse the Originator PSP with the funds available on the account of the Beneficiary. To do this, the Beneficiary PSP must issue a new SCT transaction indicating in the payment category purpose the reason code 'OTHR', and in the payment purpose the reason code 'REFU' in order to identify the nature of that transfer.

In addition, the Originator's reference in the new SCT transaction must be the reference relating to the original Recall request.

### 2.14.2 PSEMWG analysis and recommendation

The PSEMWG recommends not taking forward the change request (**option e**).

While the PSEMWG sympathises with the underlying rationale of the change request concerned, in the absence of a sound legal basis at EU level it cannot support it at this stage.

Specific provisions allowing Beneficiary PSPs to unilaterally do a (partial) transfer back of funds in case of Fraud should be included into an EU legislation first before business rules and related liabilities can be addressed through the SCT scheme rulebook. The development of the EU Payment Services Regulation (PSR) can be an opportunity to obtain such legislative coverage.

### 2.14.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.



## 2.15 # 20: Extra Reason Code 'Fraud' for Request For Recall by the Originator (RFRO)

### 2.15.1 Description

This change request was made by the Slovak banking association.

Under the Request for Recall by the Originator (RFRO) procedure, the contributor points out that there is no reason code foreseen for the RFRO message from the Originator PSP to the Beneficiary PSP to cover situations whereby the Originator was victim of a fraud. The reason code FRAD is now only possible for the Recall procedure that can be initiated only by the Originator PSP.

For the RFRO procedure, the contributor suggests adding to the existing reason codes “AC03” (Wrong IBAN), “AM09” (Wrong Amount) and “CUST” (Requested By Customer), a new type of reason code for cases when the customer claims to be a victim of a fraudulent transaction.

This new reason code will enable Beneficiary PSPs to ease the evaluation process and take all the necessary steps immediately.

### 2.15.2 PSEMWG analysis and recommendation

The PSEMWG recommends not taking forward the change request (**option e**).

It is correct that the Recall procedure can be initiated only by the Originator PSP. However, the Originator PSP may do it on behalf of the Originator for the reasons Duplicate sending, Technical problems, and Fraud (see section 4.3.2.2 of the SCT scheme rulebook).

Secondly, the Originator PSP must first assess whether the fraud claim from the Originator is justified before the claim is addressed to the Beneficiary PSP.

When the Originator is a victim of a fraud, it must contact the Originator PSP to initiate a Recall request for the reason Fraud (as for the other two Recall reasons). The channels through which the Originator can escalate such fraud cases to the Originator PSP are part of the Customer-to-PSP space and lie outside the scope of the SCT scheme rulebook.

### 2.15.3 Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.



## 2.16 # 21: Extension of Character Length for Name

### 2.16.1 Description

This change request was made by the Nordic Payments Council.

The contributor suggests extending the character length for the relevant 'Name' fields under the SCT scheme, from 70 to 140 characters.

This proposed change does not impact the SCT scheme rulebook itself, but only its related Customer-to-PSP and inter-PSP implementation guidelines.

### 2.16.2 PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**. This change request has the same goal as the change request item # 11 (see section 2.10 in this document).

### 2.16.3 Rulebook impact

If this change request is supported, this will only impact the Customer-to-PSP and the inter-PSP implementation guidelines.



## 2.17 # 29: Precisions on Recalls and Status Requests on Recalls

### 2.17.1 Description

This change request was made by BPCE Group.

The contributor proposes some precisions to the initiation of Recalls, the initiation of any related Requests for Status Update and their respective handling under the 3 credit transfer scheme rulebooks, i.e. SCT, SCT Inst and OCT Inst.

Reading the relevant Recall sections in each rulebook concerned, one can understand that:

- Only one Recall can be sent for a given original transaction. It is neither mentioned that a second Recall may be sent for this given original transaction, nor specified what could be the timeline for sending such second Recall.
- Only a Request for Status Update on the Recall can be sent in the case no response would have been provided to the Recall, and not a second Recall.
- Given the fact that the response period is 15 Banking Business Days, it seems logical that it is only at the end of this period that such Status Update can be sent.
- A received negative response to a Recall, is it before the end of the response period, is meant to be definitive and not to trigger another Recall on the same given original transaction.

The practice shows that this understanding is not shared by all participants, and this leads in some cases to:

- A second Recall sent by the Originator/Payer's PSP on the same given original transaction before the end of the response period to the first one.
- A second Recall sent by the Originator/Payer's PSP on the same given original transaction instead of a Request for Status Update on the first Recall at the end of the response period.
- A second or even a third Recall and more sent by the Originator/Payer's PSP upon receipt of a first or even second negative response.

This leads to uncertainties in the entire Recall process and possibly to a lot of non-useful (i.e. costly and time consuming) exchange.

The contributor proposes some concrete rulebook amendments.

### 2.17.2 PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**. The suggested amendments make the Recall procedure clearer.

### 2.17.3 Rulebook impact

If this change request is supported, this will impact only the rulebook and the inter-PSP implementation guidelines.



## 2.18 # 31: New XML Message Type to Exchange Extra Info between PSPs

### 2.18.1 Description

This change request was made by the Slovak banking association.

The contributor points out that under the SCT scheme, there is no XML message type used for situations when additional information between PSPs has to be exchanged, such as identification details of the client or any other information/details from a compliance request. Today, PSPs can only send a SWIFT format of such queries (MT19x, MT99x).

The aim of this request is to handle all SEPA messages and communication via the same SEPA channel. Therefore, the contributor suggests introducing a new type of XML message to the SCT scheme rulebook to enable PSPs to exchange such type of information.

### 2.18.2 PSEMWG analysis and recommendation

The PSEMWG recommends not taking forward the change request (**option e**). The PSEMWG sees a very low volume for such information requests compared to the costs associated with it for each scheme participant and CSM to implement it.

### 2.18.3 Rulebook impact

If this change request is supported, this will impact the rulebook and the inter-PSP implementation guidelines.



### **3 Changes Pertaining to the Impact of the SEPA Regulation or any Other EU Legislation**

As the EPC is under the legal obligation to ensure compliance of the rulebooks with the SEPA Regulation or of any other EU legislation, proposed changes to the rulebooks under this section are not subject to public consultation. They are included in this document for information but the contributors to this public consultation can comment on these changes.

For this release management cycle, no such changes have been deemed required at this point in time.





#### 4 Detailed Analysis of Minor Changes to the SCT Scheme Rulebook

For this release management cycle, no minor changes have been raised at this point in time.



## 5 Principles Governing the Change Management Cycle

### 5.1 Change Request Public Consultation Document

This Change Request Public Consultation Document is submitted by the PSEMWG in accordance with the procedures set out in the Internal Rules in respect of changes to the SCT scheme rulebook.

### 5.2 Structure of the Change Request Public Consultation Document

Sections 2, 3 and 4 describe the changes to the SCT scheme rulebook which are proposed in this Change Request Public Consultation Document.

These change requests fall into three categories:

- Section 2 covers innovative change requests to technical operations in chapters 3 and 4 of the SCT scheme rulebook and other significant non-technical changes which fall within the definition of a major change;
- Section 3 covers change requests to align the SCT scheme rulebook with the SEPA Regulation and any other EU legislation;
- Section 4 proposes changes to correct typing errors and provide additional clarification to the SCT scheme rulebook. These changes consist of minor changes to the SCT scheme rulebook which are uncontroversial in nature and do not affect technical operations.

Annex 1 contains all received original change requests for the 2024 SCT scheme rulebook change management cycle.



## 6 Change Management Cycle in respect of Major Change Requests

### 6.1 Consideration of Change Requests

In accordance with chapter 4.1.4 of the Internal Rules, a number of change requests with respect to the rulebooks have been submitted for consideration to the PSEMWG. 18 of these are applicable to the SCT scheme.

Following consideration of these change requests as required under chapter 4.1.6 of the Internal Rules, the PSEMWG has determined: (a) that the change requests set out in section 2 and 3 meet the criteria for acceptance into the 2024 SCT scheme rulebook change management cycle; and (b) that the change requests set out in section 4 constitute minor change requests invoking the procedures set out in Chapter 4.3 of the Internal Rules.

### 6.2 Change Request Public Consultation Document

The PSEMWG is responsible for the preparation and development of a Change Request Public Consultation Document in respect of the major change requests referred to in section 2 above, and guiding the change requests through the scheme rulebook change management cycle.

The PSEMWG has therefore formulated this Change Request Public Consultation Document under chapter 4.2 of the Internal Rules. This Change Request Public Consultation Document analyses the major changes which have been proposed and contains in Annex 1 the original change requests.

### 6.3 PSEMWG Recommendations

The PSEMWG is required under chapter 4.2.1 of the Internal Rules to issue a recommendation on the way forward with regard to each change request. The reasons underlying each recommendation are detailed in section 2. The final decision whether a change request will be incorporated into the SCT scheme rulebook is however subject to the outcome of the public consultation.

The contributors to this public consultation are requested to indicate whether they agree with the recommendation of the PSEMWG on the way forward. In case the contributors do not agree with the PSEMWG recommendation, they are requested to indicate their preferred way forward.

### 6.4 Public Consultation on the Change Requests

The EPC encourages all SEPA stakeholders to provide feedback during the public consultation. PSP communities are asked to consult all their members who are involved in the SCT scheme to ensure that the views of the payment services constituency are considered in the public consultation process. The PSEMWG encourages the PSP communities to consult as wide a range of stakeholders as possible, including participants, end users and service suppliers. All stakeholders should provide feedback to the EPC on the Change Request Public Consultation Document by **09 June 2024 at 17h00 CET at the latest. The EPC will not consider any feedback received after this deadline.**

### 6.5 Next Steps

Considering the comments received during the public consultation, the PSEMWG will produce a Change Proposal Submission Document to the PSMB for decision-making purposes in accordance with section 4.2.5 of the Internal Rules, and to the EPC Stakeholder Fora (see section 4.4 of the Internal Rules) for their respective positions on the PSEMWG Change Proposals.



Approved change requests will be incorporated into the version 1.0 of the 2025 SCT scheme rulebook and published in May 2024 with the intention that they become effective in November 2025.

#### 6.6 Further Information

The above is a summary of the change management process. If you would like further information, please refer to the Internal Rules or contact the EPC Secretariat.



## 7 Change Management Cycle in respect of Minor Change Requests

### 7.1 Publication of List of Minor Change Requests

The PSEMWG has identified certain minor change requests which they consider necessary for the SCT scheme rulebook.

The PSEMWG is required under the Internal Rules to publish a list of minor change requests on the EPC website and to ensure that the list may be viewed by all stakeholders. This obligation shall be met by the publication of this Change Request Public Consultation Document, and in particular through the provision of section 4 noting certain change requests as 'minor'.

### 7.2 Comments on the Minor Change Requests

All stakeholders may submit comments on the list of minor change requests in this Change Request Public Consultation Document.

### 7.3 Submission of the List of Minor Change Requests to the PSMB

The list of minor change requests shall be submitted to the PSMB via the Change Proposal Submission Document in accordance with section 4.2.5 of the Internal Rules.



## Annex 1 – Original Change Requests

# Template for Proposing a Change Request in an EPC Payment Scheme



European  
Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #02**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public  
Approved

Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by **31 December 2023**

Name of contributor:	Payment Scheme Evolution and Maintenance Working Group (PSEMWG)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	#02-SCT schemes-EPC-Inclusion of Alias and Proxy Definitions in the SCT Rulebooks
Scheme and document and version number:	<u>Highlight which EPC Scheme Rulebook(s) this change request relates to:</u> <b>EPC125-05 2023 SEPA Credit Transfer Rulebook</b> <b>EPC004-16 2023 SEPA Instant Credit Transfer Rulebook</b> <del>EPC016-06-2023-SEPA-Direct-Debit-Core-Rulebook</del> <del>EPC222-07-2023-SEPA-Direct-Debit-Business-to-Business-Rulebook</del> <del>EPC158-22-2023-One-Leg-Out-Instant-Credit-Transfer-Rulebook</del>
Request Date:	15 December 2023
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

16 November 2025 – effectiveness date of the two 2025 SCT scheme rulebooks.

## 1.2. Description of the change request:

During the 2022 SCT and SCT Inst scheme rulebook change management cycle held in 2021 and 2022, the 2022 change request to include the Alias and Proxy as optional attributes in both SCT schemes had been accepted.

However, the concerned 2022 change request from the submitting stakeholder did not include concrete definitions for the terms ‘Proxy’ and ‘Alias’. Consequently, such definitions had not been included in the 2023 SCT scheme rulebooks.

In the subsequent review and finalization of the Risk Management Annexes (RMAs) being an integral part of the two 2023 SCT scheme rulebooks, definitions for the two terms had been taken up in these RMAs. Inspiration was taken from the term definitions in the EPC SEPA Proxy Lookup (SPL) scheme. However, the distribution of the RMAs is restricted to only the SCT (Inst) scheme participants and scheme applicants.

Therefore, the suggestion is to insert the ‘Proxy’ and ‘Alias’ definitions from these RMAs in the SCT scheme rulebooks. In this way, also the other stakeholders have the same understanding about what is concretely meant with the terms ‘Proxy’ and ‘Alias’ in the SCT scheme rulebooks.

Proposed inclusion in Chapter 7 of the two SCT scheme rulebooks:

<b>Alias</b>	Is an alternative name used to retrieve the IBAN of a Payment Account from an Alias lookup application, system or scheme. In case of a person this would be any name different than the birth name. For a company there could be a difference between the legal and commercial name.
<b>Proxy</b>	Data used to retrieve the IBAN of a Payment Account from a Proxy lookup application, system or scheme. This could be e.g., the mobile phone number, an e-mail address of the Originator and/or of the Beneficiary.

## 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

**No. It is just the inclusion of term definitions. The rulebook attributes ‘Proxy’ and ‘Alias’ are already yellow-shaded optional message elements since the 2023 SCT scheme rulebooks.**

2. Impact on the inter-PSP space:

**No. These definitions are already known to the SCT (Inst) scheme participants through the RMAs.**

3. Impact on other payment stakeholders:

**No. These definitions are a clarification for these stakeholders. They will now have the same understanding as the SCT (Inst) scheme participants have about the terms ‘Proxy’ and ‘Alias’.**





4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

**No impact. See also the answer to question 1 above.**

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

**No impact.**

6. The nature of the change request:

- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

**Yes.**

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

**No.**

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	YES. It provides clarity to all SCT (Inst) scheme participants and stakeholders about what is concretely meant with 'Proxy' and 'Alias' under the SCT scheme rulebooks.
Is the change request supported by a cost-benefit analysis?	NO. Not necessary.
Does the change fit into the strategic objectives for SEPA?	YES. It clarifies in a unique way what the terms 'Proxy' and 'Alias' stand for.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES. It is just an inclusion of two definitions.
Do you consider that the change request does not impede SEPA-wide interoperability?	NO.
Do you consider that the change request is in the scope of the scheme involved?	YES.

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #06**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public

Approved

**Responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

Name of contributor:	Payment Scheme Evolution and Maintenance Working Group (PSEMWG) and One-Leg Out Task Force (OLO TF)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	#06 -All schemes-EPC-Introduction of Hybrid Address of the Payment End-User
Scheme and document and version number:	<u>Highlight which EPC Scheme Rulebook(s) this change request relates to:</u> <b>EPC125-05 2023 SEPA Credit Transfer Rulebook</b> <b>EPC004-16 2023 SEPA Instant Credit Transfer Rulebook</b> <b>EPC016-06 2023 SEPA Direct Debit Core Rulebook</b> <b>EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook</b> <b>EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook</b>
Request Date:	15 December 2023
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

16 November 2025 – effectiveness date of all five 2025 EPC payment scheme rulebooks.

## 1.2. Description of the change request:

### Past EPC decision

The March 2022 EPC Scheme Management Board (SMB) meeting approved the 2022 change request item #06 to exclusively use the structured address of the customer as of November 2025. This change would affect all four SEPA payment scheme rulebooks.

As of 19 November 2023<sup>1</sup>, customers would be allowed to send in a structured way their own address and/or the address of their payment counterparty in electronic Customer-to-PSP files at least when based on the corresponding EPC payment scheme Customer-to-PSP IGs.

As of 16 November 2025, the use of the structured address would become mandatory for payment service users when they would send electronic Customer-to-PSP files at least when based on the corresponding EPC payment scheme Customer-to-PSP IGs. From that date, the use of an unstructured address would no longer be allowed and would hence lead to rejects.

One element the EPC took into account for its decision was that with the exclusive use of structured addresses as of November 2025, the SEPA payment schemes would be aligned with the deadline set for the use of the structured address under the Cross-border Payments and Reporting Plus (CBPR+) and High Value Payments Plus (HVPS+) usage guidelines. These specifications define how ISO 20022 should be used for such payment messages on the SWIFT network. The SWIFT community decided to move from SWIFT MT messages to ISO 20022 standard-based XML messages by November 2025.

### Developments within SWIFT

The December 2023 SWIFT Board meeting decided to adapt its address specifications for the SWIFT Standard Release 2025. SWIFT decided to

- Step back from its initial decision to allow only structured addresses as of November 2025;
- introduce a hybrid address version by November 2025 alongside a structured address version with the hybrid address version having no expiration date; and
- Allow the unstructured address version until November 2026 (22 November 2026).

The hybrid address concerns a mix of structured and unstructured address details. It allows the combination of structured ISO 20022 address elements **and** up to two lines of 70 characters of unstructured “Address Line” <AdrLine>. Elements available in structured format must be mapped into the respective structured elements. The structured elements for “Country” <Ctry> and for “Town Name” <TwnNm> will become mandatory. Structured elements cannot be repeated in the <AdrLine> elements.

The following two diagrams from the SWIFT advisory group Payments Market Practice Group (PMPG) give further details about the upcoming changes in the period November 2025 – November 2026 and the period beyond November 2026.

---

<sup>1</sup> This date was later postponed to 17 March 2024 due to the EPC decision on 24 October 2023 to postpone the ISO version migration for all four 2023 SEPA payment scheme rulebooks to 17 March 2024.



November 2025 – November 2026

Preferred

Fully structured

- All available address data is mapped into on of the 14 ISO20022 fields
- No co-mingling of data
- No combination with "AdrLine" allowed

```
<Cdtr>
  <Nm>JOHN SMITH</Nm>
  <PstlAdr>
    <StrtNm>HOOGSTRAAT</StrtNm>
    <BldgNb>6</BldgNb>
    <Flr>18</Flr>
    <PstlCd>1000</PstlCd>
    <TwnNm>BRUSSELS</TwnNm>
    <Ctry>BE</Ctry>
  </PstlAdr>
</Cdtr>
```

Unstructured

- No combination with structured ISO20022 address elements allowed
- Difficulty to interpret data due to co-mingling of address elements

```
<Cdtr>
  <Nm>JOHN SMITH</Nm>
  <PstlAdr>
    <AdrLine>HOOGSTRAAT 6, 18th floor</AdrLine>
    <AdrLine>1000 BRUSSELS</AdrLine>
    <AdrLine>BE</AdrLine>
  </PstlAdr>
</Cdtr>
```

new

Hybrid *In scope of PMPG CR*

- Combination of structured ISO20022 address elements **and** up to 2 lines of 70 characters of unstructured "AdrLine" allowed
- Elements available in structured format must be mapped into the respective structured element (minimum: TownName & Country)
- Structured elements must not be repeated in the AdrLine element(s)

Network validation rules

Textual rule

```
<Cdtr>
  <Nm>JOHN SMITH</Nm>
  <PstlAdr>
    <PstlCd>1000</PstlCd>
    <TwnNm>BRUSSELS</TwnNm>
    <Ctry>BE</Ctry>
    <AdrLine>HOOGSTRAAT 6, 18th floor</AdrLine>
  </PstlAdr>
</Cdtr>
```

November 2026 Onwards

Preferred

Fully structured

- All available address data is mapped into on of the 14 ISO20022 fields
- No co-mingling of data
- No combination with "AdrLine" allowed

```
<Cdtr>
  <Nm>JOHN SMITH</Nm>
  <PstlAdr>
    <StrtNm>HOOGSTRAAT</StrtNm>
    <BldgNb>6</BldgNb>
    <Flr>18</Flr>
    <PstlCd>1000</PstlCd>
    <TwnNm>BRUSSELS</TwnNm>
    <Ctry>BE</Ctry>
  </PstlAdr>
</Cdtr>
```

Unstructured

- No combination with structured ISO20022 address elements allowed
- Difficulty to interpret data due to co-mingling of address elements

```
<Cdtr>
  <Nm>JOHN SMITH</Nm>
  <PstlAdr>
    <AdrLine>HOOGSTRAAT 6, 18th floor</AdrLine>
    <AdrLine>1000 BRUSSELS</AdrLine>
    <AdrLine>BE</AdrLine>
  </PstlAdr>
</Cdtr>
```

new

Hybrid *In scope of PMPG CR*

- Combination of structured ISO20022 address elements **and** up to 2 lines of 70 characters of unstructured "AdrLine" allowed
- Elements available in structured format must be mapped into the respective structured element (minimum: TownName & Country)
- Structured elements must not be repeated in the AdrLine element(s)

Network validation rules

Textual rule

```
<Cdtr>
  <Nm>JOHN SMITH</Nm>
  <PstlAdr>
    <PstlCd>1000</PstlCd>
    <TwnNm>BRUSSELS</TwnNm>
    <Ctry>BE</Ctry>
    <AdrLine>HOOGSTRAAT 6, 18th floor</AdrLine>
  </PstlAdr>
</Cdtr>
```

Re-consideration of earlier EPC decision

The EPC Payment Scheme Management Board (PSMB) re-considered the EPC decision taken back in March 2022. It is now in favour of the introduction of the hybrid address alongside the structured and the unstructured addresses in all five EPC payment schemes having in mind the following elements:



- A migration from unstructured addresses directly to fully structured addresses is a true challenge for payment end users and PSPs, especially given the current deadline of November 2025 for SEPA transactions. The time needed to change the addresses in all customer databases or to move to databases capable of supporting structured addresses, would be long.
- For customers making SEPA, high value and international payment transactions, an alignment of the address structure between the three groups of payment instruments would be the best.
- To align the address specifications under the current 2023 One-Leg Out Instant Credit Transfer (OCT Inst) rulebook (which currently stipulate the exclusive use of structured addresses as of November 2025) with those of the SWIFT Standard Release 2025 for CBPR+ and HVPS+.
- Only the structured address fields 'Town' and 'Country' are needed for regulatory screening.

### Suggestion to the EPC payment scheme rulebooks

1. Since the 2023 EPC payment scheme rulebooks, payment end users and EPC payment scheme participants are already allowed to provide fully structured addresses in their respective electronic Customer-to-PSP files and inter-PSP EPC payment messages and r-transactions.

The provision of fully structured addresses remains supported under the 2025 EPC payment scheme rulebooks as well.

This means that all scheme participants must continue to support the delivery of structured addresses when payment end users and scheme participants want a structured address in their outgoing and incoming EPC payment transactions. Scheme participants cannot reject EPC payment transactions only due to the inclusion of a structured address.

2. As of the entry-into-force date of the 2025 EPC payment scheme rulebooks being 16 November 2025, payment end users are allowed to send a **hybrid** address of the payer and/or of the payee in electronic Customer-to-PSP files at least based on the relevant EPC Customer-to-PSP Implementation Guidelines for SCT, SCT Inst, OCT Inst, SDD Core and SDD B2B transactions.

From that same date, also EPC payment scheme participants are allowed to provide hybrid addresses in their inter-PSP EPC payment messages and r-transactions.

As of 16 November 2025, all scheme participants must also be able to support the delivery of hybrid addresses when payment end users and scheme participants want a hybrid address in their outgoing and incoming EPC payment transactions. From this date, scheme participants cannot reject EPC payment transactions only due to the inclusion of a hybrid address.

3. As of the entry-into-force date of the 2025 EPC payment scheme rulebooks being 16 November 2025 up to 22 November 2026, payment end users and EPC payment scheme participants are allowed to continue providing unstructured addresses in their respective electronic Customer-to-PSP files and inter-PSP EPC payment messages and r-transactions.

In the period November 2025 – November 2026, all scheme participants must continue to support the delivery of unstructured addresses when payment end users and scheme participants want an unstructured address in their outgoing and incoming EPC payment transactions. Scheme participants cannot reject EPC payment transactions only due to the inclusion of an unstructured address.

As of 22 November 2026, the use of an **unstructured** address will **no longer be allowed and will hence lead to rejects**. Only hybrid and structured addresses will be allowed from that date onwards.



The EPC nevertheless recommends that EPC scheme participants and their customers to use the time up to November 2026 in which unstructured addresses can still be submitted (compared to initially November 2025), as an opportunity to start right away with the switch from unstructured addresses directly to fully structured addresses.

The use of structured addresses in EPC payment transactions, gives the potential to reduce errors in payment processing, regulatory screening, and reconciliation, thereby increasing the straight-through-processing of EPC payment transactions.

During the transition period up to November 2026 in which payment end users and scheme participants can start to move to the use of hybrid or preferably structured addresses, the current input of addresses with 2 occurrences of the unstructured address element “Address Line” associated with the structured address element “Country” will continue to be accepted.

Subject to the outcome of the public consultation on this change request and the final decision to be taken by the PSMB, the EPC will update the EPC document ‘[Guidance on the use of structured addresses under the SEPA payment schemes as of November 2025](#)’ (EPC 153-22) accordingly.

The provision of **hybrid** addresses in EPC payment transactions is based on the ISO 20022 “Postal Address” and must comply with following requirements:

- Mandatory use of the structured data elements “Country” and “Town Name”;
- Up to two lines of the unstructured data element “Address Line” are allowed;
- Other structured address elements must be mapped into the respective other 12 structured data elements;
- Structured data elements cannot be repeated in the “Address Line” elements.

The provision of **structured** addresses in EPC payment transactions is also based on the ISO 20022 “Postal Address” and must comply with following requirements:

- Data element “Address Line” **must not be used**
- Data elements “Country” and “Town Name” **must be used**
- All other 12 data elements may be used depending on the components of the address.

Guidance for the provision of the ISO 20022 “Postal Address” based on the community practices is provided by the PMPG (SWIFT Payment Market Practice Group) that maintains a “SWIFT ISO20022 Structure Postal Address” to be found on its [website](#).

**Proposed changes to the 2025 EPC payment scheme rulebooks:**

**Important: amended specifications to the provision of the address of the Payer and of the Payee will also be reflected in the mandatory 2025 Customer-to-PSP and Inter-PSP Implementation Guidelines of each concerned EPC payment scheme rulebook.**

**A. SCT rulebook**

**4.6 Business Requirements for Attributes**

<b>Identification:</b>	<b>AT-P005</b>
<b>Name:</b>	<b>The address of the Originator</b>
<b>Description:</b>	The information should reflect the address of the account holder being debited. Applies for DS-02: This attribute is only mandatory when the Originator PSP or the Beneficiary PSP is located in a non-EEA SEPA country or territory. This attribute





<b>Identification:</b>	<b>AT-P005</b>
<b>Name:</b>	<b>The address of the Originator</b>
	<p>can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section <b>Error! Reference source not found.</b></p> <p><i>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</i></p>

<b>Identification:</b>	<b>AT-E004</b>
<b>Name:</b>	<b>The address of the Beneficiary</b>
<b>Description:</b>	<p>The address of the Beneficiary as supplied by the Originator. This attribute can be provided in a an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section <b>Error! Reference source not found.</b></p> <p><i>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</i></p>

**B. SCT Inst rulebook**

**4.6 Business Requirements for Attributes**

<b>Identification:</b>	<b>AT-P005</b>
<b>Name:</b>	<b>The address of the Originator</b>
<b>Description:</b>	<p>The information should reflect the address of the Payment Account holder being debited.</p> <p>Applies for DS-02: This attribute is only mandatory when the Originator PSP or the Beneficiary PSP is located in a non-EEA SEPA country or territory. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section <b>Error! Reference source not found.</b></p> <p><i>Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</i></p>

<b>Identification:</b>	<b>AT-E004</b>
<b>Name:</b>	<b>The address of the Beneficiary</b>
<b>Description:</b>	<p>The address of the Beneficiary as supplied by the Originator. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section <b>Error! Reference source not found.</b></p> <p><i>Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</i></p>

**C. SDD Core rulebook and Annex VII**



#### 4.8.6 AT-E004 – The Address of the Creditor

<b>Description:</b>	The address of the Creditor as forwarded to the Debtor. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section <b>Error! Reference source not found.</b> <b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b>
---------------------	--

#### 4.8.10 AT-P005 - The Address of the Debtor

<b>Description:</b>	The address of the Debtor as registered by the Creditor. Only mandatory when the Creditor PSP or the Debtor PSP is located in a non-EEA SEPA country or territory. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section <b>Error! Reference source not found.</b> <b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b>
---------------------	---

In the Annex VII of the SDD Core rulebook, the description of the attributes AT-E004 and AT-P005 will include these amendments as well.

### D. [SDD B2B rulebook](#)

#### 4.8.8.6 AT-E004 – The Address of the Creditor

<b>Description:</b>	The address of the Creditor as forwarded to the Debtor. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section <b>Error! Reference source not found.</b> <b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b>
---------------------	--

#### 4.8.10 AT-P005 - The Address of the Debtor

<b>Description:</b>	The address of the Debtor as registered by the Creditor. Only mandatory when the Creditor PSP or the Debtor PSP is located in a non-EEA SEPA country or territory. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section <b>Error! Reference source not found.</b> <b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b>
---------------------	---

In the Annex VII of the SDD B2B rulebook, the description of the attributes AT-E004 and AT-P005 will include these amendments as well.





**E. OCT Inst rulebook**

<b>Identification:</b>	<b>AT-P005</b>
<b>Name:</b>	<b>The address of the Payer</b>
<b>Description:</b>	The information should reflect the address of the account holder being debited. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. <b>Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be permitted.</b>

<b>Identification:</b>	<b>AT-P008</b>
<b>Name:</b>	<b>The address of the Payer Reference Party</b>
<b>Description:</b>	The information should reflect the address of a person or entity in relation to whom a Payer makes a payment. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. <b>Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be permitted.</b>

<b>Identification:</b>	<b>AT-E004</b>
<b>Name:</b>	<b>The address of the Payee</b>
<b>Description:</b>	The address of the Payee as supplied by the Payer. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. <b>Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be permitted.</b>

<b>Identification:</b>	<b>AT-E009</b>
<b>Name:</b>	<b>The address of the Payee Reference Party</b>
<b>Description:</b>	The information should reflect the address of a person or entity in relation to whom a Payee receives a payment. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. <b>Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be permitted.</b>



<b>Identification:</b>	<b>AT-D006</b>
<b>Name:</b>	<b>The address of the non-Euro Leg Payer’s FI</b>
<b>Description:</b>	The information should reflect the address of the non-Euro Leg Payer’s FI. When AT-D005 is provided, then AT-D006 must be provided. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. <b>Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be permitted.</b>

<b>Identification:</b>	<b>AT-C006</b>
<b>Name:</b>	<b>The address of the non-Euro Leg Payee’s FI</b>
<b>Description:</b>	The information should reflect the address of the non-Euro Leg Payee’s FI. When AT-C005 is provided, then AT-C006 must be provided. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. <b>Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be permitted.</b>

<b>Identification:</b>	<b>AT-X005</b>
<b>Name:</b>	<b>The address of the Intermediary FI(s) of the non-Euro Leg Payer’s FI</b>
<b>Description:</b>	The information should reflect the address of the Intermediary FI(s) of the non-Euro Leg Payer’s FI. When AT-X004 is provided, then AT-X005 must be provided. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. <b>Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be permitted.</b>

### 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

**Yes. This change will impact all EPC payment scheme participants and payment end-users.**

2. Impact on the inter-PSP space:

**Yes. Such change requires analyses of and implementation preparations for multiple EPC payment and non-payment related applications and databases at the EPC payment scheme participants.**

3. Impact on other payment stakeholders:

**Yes. Such change requires analyses of and implementation preparations for multiple EPC payment and non-payment related applications and databases at the (corporate) payment end-users.**

**In their payment files, they will have to provide their EPC payment scheme participants with at least hybrid or structured addresses about payers and payees.**



4. Impact on the message standards (EPC Scheme Implementation Guidelines and other standards):

**Yes.**

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

**No impact.**

6. The nature of the change request:

a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

**Yes.**

b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

**No.**

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.



<p>Is the change request a case for SEPA wide adoption?</p>	<p>YES. It aligns the specifications of an address about the payer and the payee in EPC payment transactions with the CBPR+ and HVPS+ transactions. The same address formats will be used for EPC payment, CBPR+ and HVPS+ transactions.</p>
<p>Is the change request underpinned by a cost-benefit analysis?</p>	<p>NO. But it is in line with international standardization efforts to structure ordering customer data in payments.</p>
<p>Does the change fit into the strategic objectives for SEPA?</p>	<p>YES. The use of at least hybrid addresses in EPC payment transactions can further reduce errors in payment processing, regulatory screening, and reconciliation. This should increase the straight-through-processing of EPC payment transactions.</p>
<p>Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?</p>	<p>YES. EPC payment scheme participants and (corporate) end-users already using SWIFT MT messages must move to the delivery of at least hybrid addresses for international payments by November 2026 at the latest.</p> <p>The implementation period of up to November 2026 should give payment end-users sufficient time to determine the resources needed to accomplish this change.</p>
<p>Do you consider that the change request does not impede SEPA-wide interoperability?</p>	<p>NO.</p>
<p>Do you consider that the change request is in the scope of the scheme involved?</p>	<p>YES.</p>

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #09**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public

Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

Name of contributor:	Maria Brogren
Organisation:	Nordic Payments Council
Address:	Box 7603, 103 94 Stockholm, Sweden
Contact details:	<a href="mailto:info@npcouncil.org">info@npcouncil.org</a>
Your reference:	N/A
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> <b>EPC125-05 2023 SEPA Credit Transfer Rulebook</b> <b>EPC004-16 2023 SEPA Instant Credit Transfer Rulebook</b> <b>EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook (To be confirmed)</b>
Request Date:	
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

To be included in 2025 version of SCT and SCT Inst Schemes.

## 1.2. Description of the change request:

The suggestion is to introduce a pacs.009 message that can replace the pacs.008 used for inter-PSP transactions such as fees and interest compensation. A pacs.009 could potentially be used for other Inter-PSP transactions (not only fees and interest compensations).

In the 2023 version of SCT Scheme a new pacs.008 was introduced with the purpose to handle transactions for fees and interest compensation between PSPs, DS-11. This dataset is used between PSPs but is based on a Customer Credit Transfer (pacs.008) and not a Financial Credit Transfer (pacs.009).

The use of an adjusted Customer Credit Transfers (pacs.008) such as DS-11 provides is not fully aligned with the intentions of the ISO standard. To settle pure inter-PSP transactions in the correct way according to ISO would be to use a pacs.009.

### ISO definition of a Customer Credit Transfers (pacs.008):

The FinancialInstitutionToFinancialInstitutionCustomerCreditTransfer message is sent by the debtor agent to the creditor agent, directly or through other agents and/or a payment clearing and settlement system. It is used to move funds from a debtor account to a creditor.

### ISO definition of a Financial Credit Transfer (pacs.009):

The FinancialInstitutionCreditTransfer message is sent by a debtor financial institution to a creditor financial institution, directly or through other agents and/or a payment clearing and settlement system. It is used to move funds from a debtor account to a creditor, where both debtor and creditor are financial institutions.

We see that this suggestion is in line with <sup>1</sup>CPMI recommendations:

---

<sup>1</sup> Committee on Payments and Market Infrastructures Consultative report on ISO 20022 harmonisation requirements for enhancing cross-border payments, March 2023 (BIS)



### Requirements Block A – Fundamentals

2.5.1 Requirement #1 – To use the appropriate message for a particular business function

#### Background and rationale

While ISO 20022 has defined the scope and business function for each message, there is some risk of inconsistent use of messages or deviation from the actual scope defined for that message. This can undermine processing efficiency. For example, instead of implementing the ISO 20022 message for return payments (ie the pacs.004), certain markets choose to use a regular credit transfer message (eg pacs.008 or pacs.009) with customised, proprietary codes to identify this “new” payment as a return payment. This inconsistent use requires financial institutions participating in different markets and/or across multiple solutions to perform the same business function in different ways. This is done by using customised, rather than standardised, message implementations to identify the actual message function of a message, as opposed to the one expected per the message scope.

#### Proposed solution

The CPMI proposes to require use of ISO 20022 messages identified as part of the core set for cross-border payments in line with their scope as defined by the ISO 20022 standard.

## 1.3. Wherever possible, please indicate:

### 1. Impact on the Scheme in general:

Introduce a pacs.009 means that a new payment message must be implemented. This will affect the Rulebooks including process descriptions and rules around the message even though the purpose will still be the same as the DS-11 pacs.008 message (to start with, a possible extensional use for other purpose than fees/interest compensation could be a next step). It would also affect Scheme participants and further on even the CSM delivering the payment processing for the Scheme participants.

### 2. Impact on the inter-PSP space:

DS-11 in SCT Scheme will change from a pacs.008 to a pacs.009 message and Scheme participants need to develop this functionality.

### 3. Impact on other payment stakeholders:

N/A - This message is only between PSPs, but it will have an impact on CSMs.

### 4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

DS-11 in SCT Scheme will change from a pacs.008 to a pacs.009 message and Scheme participants need to develop this functionality.

### 5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

N/A

### 6. The nature of the change request:



- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a completely new Rulebook element is added alongside the existing Rulebook elements)

**A - Change**

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	<b>Yes</b>
Is the change request supported by a cost-benefit analysis?	<b>No</b>
Does the change fit into the strategic objectives for SEPA?	<b>Yes</b>
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	<b>Yes</b>
Do you consider that the change request does not impede SEPA-wide interoperability?	<b>Yes</b>
Do you consider that the change request is in the scope of the scheme involved?	<b>Yes</b>



# Template for Proposing a Change Request in an EPC Payment Scheme



European  
Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #10**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public

Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

<b>Name of contributors:</b>	Banque de France – Groupe BPCE – Crédit Agricole – Caisse des Dépôts et Consignations – La Banque Postale – Société Générale
<b>Organisation:</b>	
<b>Address:</b>	
<b>Contact details:</b>	Philippe Evenot – Geraldine Debost
<b>Your reference:</b>	Creation of an R-transaction : possibility for a beneficiary to return a SCT or SCT INST after the amount is credited
<b>Scheme and document and version number:</b>	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2023 SEPA Credit Transfer Rulebook EPC004-16 2023 SEPA Instant Credit Transfer Rulebook
<b>Request Date:</b>	
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

23 November 2025

## 1.2. Description of the change request:

The present change request aims to create an R-transaction “return by order of the beneficiary” which will substitute to the current R-transaction “refusal by order of the beneficiary” regarding the SCT Scheme, and will apply simultaneously to the SCT INST scheme. The beneficiaries confronted with SCT/SCT INST they do not recognise will then have a dedicated R-transaction code to return them.

Extract Guidance On Reason Codes For SCT R-transactions (EPC135-18 v4.0)

Code	Iso def	Reasons in the Rulebook or IGs	Type of R-transaction	Exhaustive list of use-cases	Possible root cause	Suggested action
MS02	Not specified reason customer generated	By order of the beneficiary	Return	Refusal by beneficiary at presentation of the SCT transaction to the beneficiary bank	The beneficiary bank acts on behalf of the beneficiary following an instruction from the beneficiary for not accepting funds from a specific account, originator or via a specific payment scheme	Originator to contact the beneficiary directly how the originator should settle any financial obligation towards the beneficiary.

Our comprehension of the reason code “refusal by order of the beneficiary” as it is set out in the EPC guidance on reason code for SCT seems rather limitative. We understand that beneficiaries must instruct their PSP **before** they receive the unwanted SCT to return it. To do so, the customers will communicate to their PSPs information such as IBAN of the Originator or Originator name (information which might have been registered on a blacklist).

This implies that customers will be able to anticipate the reception of an unwanted SCT (scenario only feasible in case of recurrent SCT). Hence the situation whereby the beneficiaries identify on their account statements a credit transfer they don’t recognise doesn’t seem to be considered.



This limitation is corroborated by the paragraph 4.3.2.2 which states functional principals related to the management of a SCT return :

- “ A 'Return' occurs when a SEPA Credit Transfer is diverted from normal execution after inter-PSP Settlement, and is sent by the Beneficiary PSP to the Originator PSP for a SEPA Credit Transfer that cannot be executed for valid reasons such as wrong account number or account closed with the consequence **that the Beneficiary account cannot be credited on the basis of the information contained in the original SEPA Credit Transfer message**. The return procedure must not be used in cases where the beneficiary wishes to return the funds. Instead the procedure of initiating a new SEPA Credit Transfer applies”.
- (.../...) Return' messages initiated by the Beneficiary PSP must be transmitted to the Originator PSP within three Banking Business Days after Settlement Date.
- Consequences of this statement are:
  - A Return is not authorised once a SCT has been credited on the beneficiary account.
  - A Return is only possible within three banking business day after settlement date

Regarding the AT-R004 reason for a Return by the Beneficiary PSP “By order of the Beneficiary”, this limitation doesn’t seem accurate as most of time the customers will contest the transaction on the basis of their account statement (i.e., after funds have been credited).

- As an alternative way to the return, beneficiaries will be obliged to initiate a new Credit Transfer to the originator of the initial transaction. It is to be noted that in country such as France whereby the IBAN of the originator is never transmitted to the beneficiary (data being considered as sensitive) the transfer-back procedure must be activated otherwise a credit transfer in the other way around will not be possible.
- Even with the assumption that the transfer-back is widely used (which is not the case in France), this procedure does not seem completely meet with the use-case “refusal by order of the beneficiary”. For an end-user, the transfer-back is meant to be used as a way of reimbursement without contesting the legitimacy of the initial transaction. We believe that beneficiaries which don’t acknowledge a credit transfer credited received from a given counterpart could have the possibility to mark their disagreement by **reversing the initial transaction with a dedicated R-transaction reason code**.
- Examples of use-case in which the use of the return SCT R-transaction “return by order of the beneficiary” might apply:
  - The beneficiaries have already been credited by some other means and they can’t accept the funds related to the received SCT, particularly if the amount is substantive (e.g., specific transaction such as the selling business assets). In this situation the beneficiaries should be in position of refusing directly the transaction by notifying its PSP the sending of a return “by order of the beneficiary”. In this specific situation the return by order of the beneficiary” might be considered as an alternative to RFRO.



- Consecutively to an error made by originators during the instruction phase (wrong IBAN of the beneficiary) beneficiaries receive SCT they do not recognize. Even though possibility is given to originators to request the fund by the sending of RFRO, the beneficiaries should also have the possibility to signify their disagreement by the sending of a return. The rationales behind that is that beneficiaries are not always able to identify the originators and to instruct them the sending of a RFRO.
  - A corporate (utility for instance) received an SCT but failed to reconcile it and is unable to identify the originator as a customer. For accounting clarification, it should have the possibility to return the transaction.
  - The reception of an unwanted received SCT can sometimes be linked to laundering attack targeting beneficiaries themselves (the latter being asked to resend the amount received by SCT or other mean of payment). In case of doubt, the best way to exonerate beneficiaries in this situation is to allow them to clearly signify their disagreement by giving them the possibility to send a return. A transfer back will not be protective as it is another transaction fully separated of the contested received one.
  - For laundering reasons, some regulated professions (e.g., lawyers) cannot freely accept some payments which are not legally justified from the beneficiary point of view and should have the possibility to expressly refuse them.
- In all the cases above, a clear and unambiguous link with the initial transaction is necessary and therefore the return is the right instrument. Those use-cases are as relevant for SCT than for SCT INST.

Consequently, we suggest for the reason code “return by order of the beneficiary” (new appellation for “refusal by order of the beneficiary”) to open the possibility to return an R-transaction **after** the fund have been credited on the beneficiary account. In this specific case the 3 days period will be far too short. We propose an extension of this timeline **not defined at the present time** but which might extend from an eight weeks period (which will allow natural persons receiving their statement account once a month to react and express their request for a return) to 13 months (in accordance with the PSD2 timeframe to reimburse a not authorised transaction). This new timeline will apply to the only reason code “return by order of the beneficiary” (three days’ timeline remaining for the other return reason codes related to SCT scheme).

### 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:
  - Regarding SCT:
    - Change of a functional rule: a return will become possible after funds having been credited on the account of the beneficiary.
    - Creation of a new timeline for return with reason code “return by order of the beneficiary”.
  - Regarding SCT INST:
    - Functional change as return consequent to an initial transaction will be allowed.



2. Impact on the inter-PSP space:

- If we consider CSM cannot distinguish R-transactions related to their reason codes, all R-transactions will become technically “passing” after the settlement date and during the agreed timeframe. Communication towards CSM especially when they check the timeline of R-transaction will be necessary.
- In between the reception of the initial SCT and the sending of the return it might happen that the originator account is closed. Such situation might cause issue for the originator PSP (similar to the one existing in SDD Core scheme) and will probably require an update of SCT RMA.

3. Impact on other payment stakeholders:

- PSPs might adapt their acquisition channel (bank online, digital app) to give their customers the possibility to return a SCT/SCT INST transaction after the beneficiary account has been credited and for the agreed period.
- For customers in position of beneficiaries receiving an SCT/SCT INST they do not acknowledge it will constitute an improvement in comparison to the current situation by giving them the possibility to mark their refusal.

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

None identified at this stage.

6. The nature of the change request:

- a. **A change** (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)
- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.



Is the change request a case for SEPA wide adoption?	<b>Yes if we consider it provides a new service to end-user.</b>
Is the change request supported by a cost-benefit analysis?	<b>Not at this stage</b>
Does the change fit into the strategic objectives for SEPA?	<b>Yes as it contributes to the improvement of the scheme, and is more protective for a beneficiary receiving a SCT without being the legitimate recipient.</b>
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	<b>On the technical point of view, no major difficulties have been identified at this stage.</b>
Do you consider that the change request does not impede SEPA-wide interoperability?	<b>No issue identified so far.</b>
Do you consider that the change request is in the scope of the scheme involved?	<b>Yes.</b>

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #11**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public

Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

<b>Name of contributor:</b>	Payment Scheme Evolution and Maintenance Working Group (PSEMWG) and One-Leg Out Task Force (OLO TF)
<b>Organisation:</b>	EPC
<b>Address:</b>	
<b>Contact details:</b>	
<b>Your reference:</b>	<b>#11-All schemes-EPC-Extension of Character Length for Name</b>
<b>Scheme and document and version number:</b>	<u>Highlight which EPC Scheme Rulebook(s) this change request relates to:</u> <b>EPC125-05 2023 SEPA Credit Transfer Rulebook</b> <b>EPC004-16 2023 SEPA Instant Credit Transfer Rulebook</b> <b>EPC016-06 2023 SEPA Direct Debit Core Rulebook</b> <b>EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook</b> <b>EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook</b>
<b>Request Date:</b>	<b>15 December 2023</b>
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

16 November 2025 – effectiveness date of all five EPC payment scheme rulebooks.

## 1.2. Description of the change request:

In the Customer-to-PSP and Inter-PSP Implementation Guidelines (IGs) for each of the five EPC payment scheme rulebooks, the SEPA length of characters is currently set at 70 characters for the name fields for the following attributes:

- Originator (AT-P001), Originator Reference Party (AT-P006), Beneficiary (AT-E001) and Beneficiary Reference Party (AT-E007) for the SCT and SCT Inst rulebooks;
- Creditor (AT-E001), Creditor Reference Party (AT-E007), Debtor (AT-P001) and Debtor Reference Party (AT-P006) for the SDD Core and SDD B2B rulebooks;
- Payer (AT-P001), Payer Reference Party (AT-P006), Payee (AT-E001), Payee Reference Party (AT-E007), non-Euro Leg Payer's FI (AT-D005), non-Euro Leg Payee's FI (AT-C005), Intermediary FI(s) of the non-Euro Leg Payer's FI (AT-X004) for the OCT Inst rulebook.

The current limit of 70 characters for the name fields dates to the early development of the message specifications for the SCT rulebook in the 2000s. Initially, the 2006 message version of the ISO 20022 standard was used for these specifications. The 2006 message version had a limit of 70 characters for the name fields. When the first operational SCT scheme version was launched in 2008, it was based on the 2006 message version.

From the version 4.0 of the SEPA payment schemes entering into force in November 2010, they were based on the 2009 message version of the ISO 20022 standard which then already supported 140 characters for the name field. As there was no request from European communities to extend the name length for SEPA transactions, the limit of 70 characters was maintained and taken over as such for the SDD, SCT Inst and OCT Inst schemes.

The suggestion is to extend the number of characters of the name fields **for all upper-mentioned attributes** from 70 to 140 characters as:

- The 2019 ISO 20022 standard foresees up to 140 characters for the 'Debtor', 'Ultimate Debtor', 'Creditor', 'Ultimate Creditor' and 'Financial Institution' name fields.
- The Cross-border Payments and Reporting Plus (CBPR+) specifications also allow 140 characters for these name fields. This allows all EPC payment schemes, and the OCT Inst scheme in particular, to be aligned with these international specifications.
- The provision of extra characters allows payment service users to enter the complete name(s) concerned. This avoids the issue of data truncation and can provide the payment service user with further transparency about the identity of the payment counterparty and/or its reference parties and the financial institution(s) involved (the latter only for the OCT Inst scheme).
- The possibility to provide the complete name(s) can support the obligations for PSPs with respect to regulatory screening and up-front verification of payment counterparty names (such as Confirmation of Payee).

This proposed change does not impact the EPC payment scheme rulebooks themselves, but only their related Customer-to-PSP and inter-PSP implementation guidelines.





**Important: if the 2024 change request item #12 on the inclusion of the commercial trade name would be supported, the maximum length of the commercial trade name could become 140 characters as well (depending on the final message element selected to transport the commercial trade name).**

### 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

**No. It does not impact the business rules of each scheme concerned as such.**

2. Impact on the inter-PSP space:

**Yes. it has major implications in the various systems supporting the acceptance, the processing and storage of EPC payment scheme transactions and related data.**

**PSPs must increase the character capacity for the various name fields in their payment initiation channels, their internal EPC payment transaction processing systems, and in their account statement and payment transaction archiving systems.**

**The transaction message exchange systems with other PSPs and with other inter-PSP space actors (e.g., CSMs) will have to be adapted as well to accept and to support the transmission of longer name data.**

**With respect to the OCT Inst scheme in particular: when (to be) provided, the legal entity name(s) of the non-Euro Leg FI(s) involved in the entire international payment chain can be delivered in full which facilitates further regulatory screening.**

3. Impact on other payment stakeholders:

**Yes. They will have the opportunity to send and/or receive the full first name(s) and surname(s) or the full legal entity name of themselves, their payment counterparties, and/or of their reference parties. The truncation of long names or of name combinations (e.g., account held by multiple natural persons) can be avoided at all or strongly reduced. This gives the payment service user more transparency about the identity of its payment counterparty and/or of its reference party.**

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

**No impact. The 2019 version of the ISO 20022 standard already supports the transmission of up to 140 characters for the name field. The maximum SEPA length for the name field must be set from 70 to 140 characters.**

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

**No impact.**

6. The nature of the change request:



- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

**Yes.**

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

**No.**

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	YES. It can provide the payment service user with further transparency about the identity of itself, the payment counterparty and/or their respective reference parties.  For the OCT Inst scheme, it is also an alignment with the specifications set for a name field under the CBPR+ usage guidelines.
Is the change request supported by a cost-benefit analysis?	NO.
Does the change fit into the strategic objectives for SEPA?	YES. Providing the payment end-user with more transparency is part of the work plan of the Euro Retail Payments Board (ERPB).  For the OCT Inst scheme, it also provides Euro Leg PSPs with the full or a more elaborate name about the non-Euro Leg FIs involved in the non-Euro Leg.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES. The maximum SEPA length for the name field must be set from 70 to 140 characters.
Do you consider that the change request does not impede SEPA-wide interoperability?	NO. It only concerns extending the data capacity of a specific message element for EPC payment scheme transactions.
Do you consider that the change request is in the scope of the scheme involved?	YES.

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #12**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public  
Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

<b>Name of contributor:</b>	Payment Scheme Evolution and Maintenance Working Group (PSEMWG)
<b>Organisation:</b>	EPC
<b>Address:</b>	
<b>Contact details:</b>	
<b>Your reference:</b>	<b>#12-All SEPA schemes-EPC-Inclusion of commercial trade name</b>
<b>Scheme and document and version number:</b>	Highlight which EPC Scheme Rulebook(s) this change request relates to: <a href="#">EPC125-05 2023 SEPA Credit Transfer Rulebook</a> <a href="#">EPC004-16 2023 SEPA Instant Credit Transfer Rulebook</a> <a href="#">EPC016-06 2023 SEPA Direct Debit Core Rulebook</a> <a href="#">EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook</a> <del><a href="#">EPC158-22 2023 One Leg Out Instant Credit Transfer Rulebook</a></del>
<b>Request Date:</b>	<b>15 December 2023</b>
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

16 November 2025 – effectiveness date of the **four** SEPA payment scheme rulebooks concerned.

## 1.2. Description of the change request:

The Statement of the June 2021 Euro Retail Payments Board (ERPB) meeting endorsed a set of recommendations formulated by the ERPB working group on transparency for retail payment end-users.

One recommendation assigned to payment schemes such as the EPC payment schemes relates to the commercial trade name i.e. recommendation id 01: *Consistently use commercial trade name and provide this name to all involved parties in the payment chain for use in client’s payment account statements.*

Furthermore, the commercial trade name is referred to in Article 25 ‘Information for the payer on individual payment transactions’ of the proposed Payment Services Regulation (PSR), and in Article 2 (1c) of the amended SEPA Regulation.

The PSEMWG analysed to what extent the existing EPC payment scheme attributes suffice to meet the identified need or whether additional attributes would be needed.

Following this analysis, the following new attributes related to the “whom” are proposed being **yellow optional** fields in the relevant payment scheme implementation guidelines. As a yellow optional field, all scheme participants must support this ISO message element throughout their SEPA payment systems even though payment service users would still be free to use these elements or not.

### A. SCT rulebook

#### New attributes

<b>Identification:</b>	<b>AT-E002</b>
<b>Name:</b>	<b>The commercial trade name of the Beneficiary</b>
<b>Description:</b>	The commercial trade name of the Beneficiary, if different to the legal name of the Beneficiary as used in AT-E001, as supplied by the Originator. This attribute is used in combination with AT-E001 and cannot substitute attribute AT-E001.

<b>Identification:</b>	<b>AT-E008</b>
<b>Name:</b>	<b>The commercial trade name of the Beneficiary Reference Party</b>
<b>Description:</b>	The commercial trade name of a person in relation to whom a Beneficiary receives a payment, if different to the legal name of the Beneficiary Reference Party as used in AT-E007. This attribute is used in combination with AT-E007 and cannot substitute attribute AT-E007.

These attributes are added in the following datasets in the SCT rulebook **and related Annex V**:

- DS-01 Customer-to-PSP SEPA Credit Transfer Information
- DS-02 The Inter-PSP Payment
- DS-04 The PSP-to-Customer SEPA Credit Transfer Information



These new attributes will be indicated as optional attributes in the datasets DS-02 and DS-04. This means that only when these attributes are completed in DS-01, they must be transported as such in DS-02 and DS-04.

**Changes to datasets in the SCT rulebook and related Annex V:**

<b>Identification</b>	<b>DS-04</b>
<b>Name:</b>	<b>The PSP-to-Customer SEPA Credit Transfer Information</b>
<b>Description:</b>	Description of the minimum information that a Beneficiary PSP needs to make available to the Beneficiary.
<b>Attributes contained:</b>	<ul style="list-style-type: none"> <li>(...)</li> </ul>
<b>Rules applied:</b>	(...) A Beneficiary PSP may drop received extended Reference Party information (attributes P006, P007, E007, E008, E010 and T007) and not make it available to a Beneficiary who uses an interface which does not comply with the ISO 20022 XML standard.
<b>Remarks:</b>	These attributes reflect business requirements

**B. SCT Inst rulebook**

**New attributes**

<b>Identification:</b>	<b>AT-E002</b>
<b>Name:</b>	<b>The commercial trade name of the Beneficiary</b>
<b>Description:</b>	The commercial trade name of the Beneficiary, if different to the legal name of the Beneficiary as used in AT-E001, as supplied by the Originator. This attribute is used in combination with AT-E001 and cannot substitute attribute AT-E001.

<b>Identification:</b>	<b>AT-E008</b>
<b>Name:</b>	<b>The commercial trade name of the Beneficiary Reference Party</b>
<b>Description:</b>	The commercial trade name of a person in relation to whom a Beneficiary receives a payment, if different to the legal name of the Beneficiary Reference Party as used in AT-E007. This attribute is used in combination with AT-E007 and cannot substitute attribute AT-E007.

These attributes are added in the following datasets:

- DS-01 Customer-to-PSP Credit Transfer Information
- DS-02 The Inter-PSP Payment
- DS-04 The PSP-to-Customer SCT Inst Information

These new attributes will be indicated as optional attributes in the datasets DS-02, DS-04 and DS-10. This means that only when these attributes are completed in DS-01, they must be transported as such in DS-02, DS-04 and DS-10.



**Changes to datasets in the SCT Inst rulebook**

<b>Identification</b>	<b>DS-04</b>
<b>Name</b>	<b>The PSP-to-Customer SCT Inst information dataset</b>
<b>Description</b>	Description of the minimum information that a Beneficiary PSP needs to make available to the Beneficiary.
<b>Attributes contained</b>	<ul style="list-style-type: none"> <li>(...)</li> </ul>
<b>Rules applied</b>	<p>(...)</p> <p>A Beneficiary PSP may drop received extended Reference Party information (attributes P006, P007, E007, E008, E010 and T007) and not make it available to a Beneficiary who uses an interface which does not comply with the ISO 20022 XML standard.</p>
<b>Remarks</b>	<p>These attributes reflect business requirements.</p> <p>This message cannot be confused with the dataset DS-10 Positive Notification Message to the Beneficiary.</p>

**C. SDD Core rulebook**

**New attribute sections**

**AT-E002 – The Commercial Trade Name of the Creditor**

<b>Description:</b>	<p>The commercial trade name of the Creditor, if different to the legal name of the Creditor as used in AT-E001, as supplied by the Creditor.</p> <p>This attribute is used in combination with AT-E001 and cannot substitute attribute AT-E001.</p>
---------------------	--

**AT-E008 – The Commercial Trade Name of the Creditor Reference Party**

<b>Description:</b>	<p>The commercial trade name of a person in relation to whom a Creditor collects a payment, if different to the legal name of the Creditor Reference Party as used in AT-E007. This attribute is used in combination with AT-E007 and cannot substitute attribute AT-E007.</p> <p>Information relating to a Creditor Reference Party is included only for the purpose of assisting the Debtor and/or Creditor in managing their payments and is not required to be provided to or by the Debtor PSP and/or Creditor PSP for the purpose of effecting the payment to which the information relates.</p>
---------------------	--

These attributes are added in the following datasets:

- DS-01 The Mandate
- DS-02 The Dematerialised Mandate
- DS-03 Customer to PSP Collection
- DS-04 The Inter-PSP Collection
- DS-12 The e-Mandate proposal /request message (only in Annex VII of the rulebook)
- DS-13 The validation message (only in Annex VII of the rulebook)

These new attributes will be indicated as

- Part of the sub-section ‘Additional attributes for information only’ in DS-01;
- New attribute items ‘By the Creditor: E002... (optional)’ and ‘By the Creditor: E008... (optional)’ in DS-01;



- Attributes with the mention '(if present in DS-01)' in the dataset DS-02;
- Attributes with the mention '(if present in DS-02)' in the dataset DS-03;
- Attributes with the mention '(if present in DS-03)' in the datasets DS-04;
- Optional attributes in the datasets DS-12 and DS-13.

This means that only when these attributes are completed in DS-01, they must be transported as such in DS-03, DS-04, DS-12 and DS-13 included.

### Amendments in Annex VII – e-Mandates: process steps PT-07.01, PT-08.01 and PT-09.01

(...)

*"If the Creditor does not need to use the attributes "AT-E007 The name of the Creditor reference party", "AT-E008 The Commercial Trade Name of the Creditor Reference Party", "AT-E010 The identification code of the Creditor Reference party", "AT-P006 The name of the Debtor Reference party" and "AT-P007 The identification code of the Debtor Reference Party", he does not need to present these attributes in the template based on DS-01."*

And add in the section "a. By the Creditor:" of each concerned process step, the new attributes AT-E002 and AT-E008 while indicating that both attributes are "(optional)".

#### D. SDD B2B rulebook

##### New attribute sections

##### AT-E002 – The Commercial Trade Name of the Creditor

<b>Description:</b>	The commercial trade name of the Creditor, if different to the legal name of the Creditor as used in AT-E001, as supplied by the Creditor. This attribute is used in combination with AT-E001 and cannot substitute attribute AT-E001.
---------------------	---

##### AT-E008 – The Commercial Trade Name of the Creditor Reference Party

<b>Description:</b>	The commercial trade name of a person in relation to whom a Creditor collects a payment, if different to the legal name of the Creditor Reference Party as used in AT-E007. This attribute is used in combination with AT-E007 and cannot substitute attribute AT-E007. Information relating to a Creditor Reference Party is included only for the purpose of assisting the Debtor and/or Creditor in managing their payments and is not required to be provided to or by the Debtor PSP and/or Creditor PSP for the purpose of effecting the payment to which the information relates.
---------------------	---

These attributes are added in the following datasets:

- DS-01 The Mandate
- DS-02 The Dematerialised Mandate
- DS-03 Business Customer-to-PSP Collection
- DS-04 The Inter-PSP Collection
- DS-12 The e-Mandate proposal /request message (only in Annex VII of the rulebook)
- DS-13 The validation message (only in Annex VII of the rulebook)

These new attributes will be indicated as

- Part of the sub-section 'Additional attributes for information only' in DS-01;



- New attribute items 'By the Creditor: E002... (optional)' and 'By the Creditor: E008... (optional)' in DS-01;
- Attributes with the mention '(if present in DS-01)' in the dataset DS-02;
- Attributes with the mention '(if present in DS-02)' in the dataset DS-03;
- Attributes with the mention '(if present in DS-03)' in the datasets DS-04, DS-06, and DS-08 to DS-11 included;
- Optional attributes in the datasets DS-12 and DS-13.

This means that only when these attributes are completed in DS-01, they must be transported as such in DS-03, DS-04, DS-12 and DS-13 included.

### Amendments in Annex VII – e-Mandates: process steps PT-07.01, PT-08.01 and PT-09.01

(...)

*"If the Creditor does not need to use the attributes "AT-E007 The name of the Creditor reference party", "AT-E008 The Commercial Trade Name of the Creditor Reference Party", "AT-E010 The identification code of the Creditor Reference party", "AT-P006 The name of the Debtor Reference party" and "AT-P007 The identification code of the Debtor Reference Party", he does not need to present these attributes in the template based on DS-01."*

And add in the section "a. By the Creditor:" of each concerned process step, the new attributes AT-E002 and AT-E008 while indicating that both attributes are "(optional)".

### 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

**Yes. This change will impact all SEPA payment scheme participants and payment end-users.**

2. Impact on the inter-PSP space:

**Yes. The new attributes require appropriate XML message fields and/or usage rules to be implemented by all SEPA payment scheme participants.**

3. Impact on other payment stakeholders:

**Yes. Payees now have the possibility to provide the payer with more details about the other name(s) the payee and the payee reference party use in their commercial activities. This gives the payer more information about the payee.**

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

**Yes.**

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

**No impact.**

6. The nature of the change request:

- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

**Yes.**

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)





No.

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	YES. It is based on the recommendation agreed upon by the supply side and the demand side of the euro payments market representatives in the Euro Retail Payments Board (ERPB).  It also reflects the developments noted in the relevant (updated) EU legislations which refer to commercial trade names as well.
Is the change request underpinned by a cost-benefit analysis?	NO.
Does the change fit into the strategic objectives for SEPA?	YES. Transparency for the payment end-user is part of the ERPB's work plan.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES.
Do you consider that the change request does not impede SEPA-wide interoperability?	NO.
Do you consider that the change request is in the scope of the scheme involved?	YES.

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #13**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public  
Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

Name of contributor:	Payment Scheme Evolution and Maintenance Working Group (PSEMWG)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	<b>#13-All SEPA schemes-EPC-Inclusion of reference party address</b>
Scheme and document and version number:	Highlight which EPC Scheme Rulebook(s) this change request relates to: <b>EPC125-05 2023 SEPA Credit Transfer Rulebook</b> <b>EPC004-16 2023 SEPA Instant Credit Transfer Rulebook</b> <b>EPC016-06 2023 SEPA Direct Debit Core Rulebook</b> <b>EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook</b> <del>EPC158-22 2023 One Leg Out Instant Credit Transfer Rulebook</del>
Request Date:	<b>15 December 2023</b>
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

16 November 2025 – effectiveness date of the **four SEPA** payment scheme rulebooks concerned.

## 1.2. Description of the change request:

The Statement of the June 2021 Euro Retail Payments Board (ERPB) meeting endorsed a set of recommendations formulated by the ERPB working group on transparency for retail payment end-users.

One aspect for which transparency can be improved is about the reference parties of the payer and of the payee.

The SEPA payment scheme rulebooks currently support only the exchange of the name and an identification code of such reference parties. The proposal is to also allow the exchange of the address of such reference parties. Payment end-users would no longer have to use other fields (such as the remittance information field) to provide such address data. It also allows better regulatory processing of such reference party data.

The following new attributes are proposed being **yellow optional** fields in the relevant payment scheme implementation guidelines. As a yellow optional field, all scheme participants must support this ISO message element throughout their SEPA payment systems even though payment service users would still be free to use this element or not.

**Important: the proposed specifications to be followed to complete such addresses are aligned with the specifications proposed for the 2024 change request item #06.**

**Subject to the final decision by the Payment Scheme Management Board (PSMB) for item #06, the proposed address specifications for the reference parties may remain unchanged or may be adapted accordingly.**

### A. SCT rulebook

#### New attributes

<b>Identification:</b>	<b>AT-P008</b>
<b>Name:</b>	<b>The address of the Originator Reference Party</b>
<b>Description:</b>	<p>The information should reflect the address of a person or entity in relation to whom an Originator makes a payment.</p> <p>This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1.</p> <p><b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b></p>

<b>Identification:</b>	<b>AT-E009</b>
<b>Name:</b>	<b>The address of the Beneficiary Reference Party</b>
<b>Description:</b>	<p>The information should reflect the address of a person or entity in relation to whom a Beneficiary receives a payment.</p> <p>This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1.</p>



**Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.**

These attributes are added in the following datasets in the SCT rulebook **and related Annex V**:

- DS-01 Customer-to-PSP SEPA Credit Transfer Information
- DS-02 The Inter-PSP Payment
- DS-04 The PSP-to-Customer SEPA Credit Transfer Information

These new attributes will be indicated as optional attributes in the datasets DS-02 and DS-04. This means that only when these attributes are completed in DS-01, they must be transported as such in DS-02 and DS-04.

**Changes to datasets in the SCT rulebook and related Annex V:**

<b>Identification</b>	<b>DS-04</b>
<b>Name:</b>	<b>The PSP-to-Customer SEPA Credit Transfer Information</b>
<b>Description:</b>	Description of the minimum information that a Beneficiary PSP needs to make available to the Beneficiary.
<b>Attributes contained:</b>	<ul style="list-style-type: none"> <li>• (...)</li> </ul>
<b>Rules applied:</b>	(...) A Beneficiary PSP may drop received extended Reference Party information (attributes P006, P007, P008, E007, E009, E010 and T007) and not make it available to a Beneficiary who uses an interface which does not comply with the ISO 20022 XML standard.
<b>Remarks:</b>	These attributes reflect business requirements

**B. SCT Inst rulebook**

**New attributes**

<b>Identification:</b>	<b>AT-P008</b>
<b>Name:</b>	<b>The address of the Originator Reference Party</b>
<b>Description:</b>	The information should reflect the address of a person or entity in relation to whom an Originator makes a payment. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. <b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b>

<b>Identification:</b>	<b>AT-E009</b>
<b>Name:</b>	<b>The address of the Beneficiary Reference Party</b>
<b>Description:</b>	The information should reflect the address of a person or entity in relation to whom a Beneficiary receives a payment. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1.



**Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.**

These attributes are added in the following datasets:

- DS-01 Customer-to-PSP Credit Transfer Information
- DS-02 The Inter-PSP Payment
- DS-04 The PSP-to-Customer Credit Transfer Information

These new attributes will be indicated as optional attributes in the datasets DS-02 and DS-04. This means that only when these attributes are completed in DS-01, they must be transported as such in DS-02 and DS-04.

### Changes to datasets in the SCT Inst rulebook

<b>Identification</b>	DS-04
<b>Name</b>	The PSP-to-Customer SCT Inst information dataset
<b>Description</b>	Description of the minimum information that a Beneficiary PSP needs to make available to the Beneficiary.
<b>Attributes contained</b>	<ul style="list-style-type: none"> <li>• (...)</li> </ul>
<b>Rules applied</b>	<p>(...)</p> <p>A Beneficiary PSP may drop received extended Reference Party information (attributes P006, P007, P008, E007, E009, E010 and T007) and not make it available to a Beneficiary who uses an interface which does not comply with the ISO 20022 XML standard.</p>
<b>Remarks</b>	<p>These attributes reflect business requirements.</p> <p>This message cannot be confused with the dataset DS-10 Positive Notification Message to the Beneficiary.</p>

### C. SDD Core rulebook

#### New attribute sections

##### AT-E009 – The address of the Creditor Reference Party

<b>Description:</b>	<p>The information should reflect the address of a person or entity in relation to whom a Creditor collects a payment.</p> <p>This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1.</p> <p><b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b></p>
---------------------	---



### AT-P008 – The address of the Debtor Reference Party

<b>Description:</b>	The information should reflect the address of a person or entity in relation to whom a Debtor is debited for. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. <b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b>
---------------------	--

These attributes are added in the following datasets:

- DS-01 The Mandate
- DS-02 The Dematerialised Mandate
- DS-03 Customer to PSP Collection
- DS-04 The Inter-PSP Collection
- DS-12 The e-Mandate proposal /request message (only in Annex VII of the rulebook)
- DS-13 The validation message (only in Annex VII of the rulebook)

These new attributes will be indicated as

- Part of the sub-section ‘Additional attributes for information only’ in DS-01;
- New attribute items ‘By the Creditor: E009... (optional)’ and ‘By the Debtor: P008... (optional)’ in DS-01;
- Attributes with the mention ‘(if present in DS-01)’ in the dataset DS-02;
- Attributes with the mention ‘(if present in DS-02)’ in the dataset DS-03;
- Attributes with the mention ‘(if present in DS-03)’ in the dataset DS-04;
- Optional attributes in the datasets DS-12 and DS-13.

This means that only when these attributes are completed in DS-01, they must be transported as such in DS-03, DS-04, DS-12 and DS-13 included.

### Amendments in Annex VII – e-Mandates: process steps PT-07.01, PT-08.01 and PT-09.01

(...)

*“If the Creditor does not need to use the attributes “AT-E007 The name of the Creditor reference party”, “AT-E010 The identification code of the Creditor Reference party”, “AT-E009 – The address of the Creditor Reference Party”, “AT-P006 The name of the Debtor Reference party”, “AT-P007 The identification code of the Debtor Reference Party” and “AT-P008 – The address of the Debtor Reference Party”, he does not need to present these attributes in the template based on DS-01.”*

And add in the section “a. By the Creditor:” of each concerned process step, the new attribute AT-E009 while indicating that the attribute is “(optional)”.

And add in the section “b. By the Debtor:” of each concerned process step, the new attribute AT-P009 while indicating that the attribute is “(optional)”.

### D. SDD B2B rulebook



## New attribute sections

### AT-E009 – The address of the Creditor Reference Party

<b>Description:</b>	<p>The information should reflect the address of a person or entity in relation to whom a Creditor collects a payment.</p> <p>This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1.</p> <p><b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b></p>
---------------------	---

### AT-P008 – The address of the Debtor Reference Party

<b>Description:</b>	<p>The information should reflect the address of a person or entity in relation to whom a Debtor is debited for.</p> <p>This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1.</p> <p><b>Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.</b></p>
---------------------	---

These attributes are added in the following datasets:

- DS-01 The Mandate
- DS-02 The Dematerialised Mandate
- DS-03 Customer to PSP Collection
- DS-04 The Inter-PSP Collection
- DS-12 The e-Mandate proposal /request message (only in Annex VII of the rulebook)
- DS-13 The validation message (only in Annex VII of the rulebook)

These new attributes will be indicated as

- Part of the sub-section ‘Additional attributes for information only’ in DS-01;
- New attribute items ‘By the Creditor: E009... (optional)’ and ‘By the Debtor: P008... (optional)’ in DS-01;
- Attributes with the mention ‘(if present in DS-01)’ in the dataset DS-02;
- Attributes with the mention ‘(if present in DS-02)’ in the dataset DS-03;
- Attributes with the mention ‘(if present in DS-03)’ in the dataset DS-04;
- Optional attributes in the datasets DS-12 and DS-13.

This means that only when these attributes are completed in DS-01, they must be transported as such in DS-03, DS-04, DS-12 and DS-13 included.

### Amendments in Annex VII – e-Mandates: process steps PT-07.01, PT-08.01 and PT-09.01

(...)

*“If the Creditor does not need to use the attributes “AT-E007 The name of the Creditor reference party”, “AT-E010 The identification code of the Creditor Reference party”, “AT-E009 – The address of the Creditor Reference Party”, “AT-P006 The name of the Debtor Reference party”, “AT-P007 The identification code of the Debtor Reference Party” and “AT-P008 – The address of the Debtor Reference Party”, he does not need to present these attributes in the template based on DS-01.”*



And add in the section “a. By the Creditor:” of each concerned process step, the new attribute AT-E009 while indicating that the attribute is “(optional)”.

And add in the section “b. By the Debtor:” of each concerned process step, the new attribute AT-P009 while indicating that the attribute is “(optional)”.

### 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

**Yes. This change will impact all SEPA payment scheme participants and payment end-users.**

2. Impact on the inter-PSP space:

**Yes. The new attributes require appropriate XML message fields and/or usage rules to be implemented by all SEPA payment scheme participants.**

3. Impact on other payment stakeholders:

**Yes. Payers and payees now have the possibility to provide the payees and payers with concrete address details about their respective reference parties in their commercial activities. This gives the payer and the payee more information about the reference parties of the payee and of the payer.**

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

**Yes.**

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

**No impact.**

6. The nature of the change request:

a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

**Yes.**

b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

**No.**

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.





Is the change request a case for SEPA wide adoption?	YES. It provides payers and payees more transparency about the reference parties on whose behalf the payee and payer is credited and debited.
Is the change request underpinned by a cost-benefit analysis?	NO.
Does the change fit into the strategic objectives for SEPA?	YES. Transparency for the payment end-user is part of the ERPB's work plan.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES.
Do you consider that the change request does not impede SEPA-wide interoperability?	NO.
Do you consider that the change request is in the scope of the scheme involved?	YES.

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #15**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public  
Approved

Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by **31 December 2023**

<b>Name of contributor:</b>	Payment Committee Switzerland
<b>Organisation:</b>	SIX Interbank Clearing Ltd
<b>Address:</b>	Hardturmstrasse 201, 8021 Zürich
<b>Contact details:</b>	Martin Walder, SIX BBS
<b>Your reference:</b>	SEPA-2025-CR-UETR
<b>Scheme and document and version number:</b>	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2023 SEPA Credit Transfer Rulebook EPC004-16 2023 SEPA Instant Credit Transfer Rulebook <i>EPC016-06 2023 SEPA Direct Debit Core Rulebook</i> <i>EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook</i> EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook
<b>Request Date:</b>	14.12.2023
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

Change Cycle November 2025

## 1.2. Description of the change request:

Add an attribute “Unique End-to-End Transaction Reference (UETR)” for SCT and SCT Inst. Include this attribute in the data-sets, where beneficial and feasible (e.g. DS-01 Customer-to-PSP SEPA Credit Transfer Information, DS-02 The Inter-PSP Payment Dataset, DS-03 The Reject or Return SEPA Credit Transfer Dataset, DS-04 The PSP-to-Customer SEPA Credit Transfer Information, DS-05 The Recall of a SEPA Credit Transfer Dataset, DS-06 Response to a Recall of SEPA Credit Transfer Dataset, DS-07 Request for Recall by the Originator dataset, DS-08 Dataset for the Response to the Request for Recall by the Originator, DS-09 SCT Inquiry Dataset, DS-10 Response-to-SCT-Inquiry Dataset, and its equivalent in SCT-Inst, respectively in the new rulebooks).

The attribute should be optional, but if delivered by one involved parties, it has to be passed on. In addition, if a inquiry is sent with an UETR, the response has to include the respective UETR unchanged.

## 1.3. Wherever possible, please indicate:

### 1. Impact on the Scheme in general:

To include and UETR in a payment instruction is becoming more and more common. Therefore, this adaption closes a gap to other schemes, market practices and implementation. SCT and SCT Inst are getting better aligned with OCT Inst.

### 2. Impact on the inter-PSP space:

UETR is not only used for tracking, but also for identifying a specific transaction in case of exception and investigation handling. Therefore, that this enhancement facilitates automation and improvements of such processes.

### 3. Impact on other payment stakeholders:

Clients and PSP can align their processes with other market practices and improve the quality of their services.

### 4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

Open an existing ISO 20022 element and mark it as “yellow” field.

### 5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

n/a



6. The nature of the change request:

- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

Add an optional attribute.

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

Add a rule in regards of responses.

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	<b>YES</b>
Is the change request supported by a cost-benefit analysis?	<b>YES</b> especially the facilitation for E&I
Does the change fit into the strategic objectives for SEPA?	<b>YES</b> closes a gap to other networks and market practices
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	<b>YES</b> UETR is already used with CBPR+ (SWIFT) and OCT Inst
Do you consider that the change request does not impede SEPA-wide interoperability?	<b>YES</b> the attribute remains optional
Do you consider that the change request is in the scope of the scheme involved?	<b>YES</b>

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #16**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public  
Approved

Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by **31 December 2023**

<b>Name of contributor:</b>	Payment Committee Switzerland
<b>Organisation:</b>	SIX Interbank Clearing Ltd
<b>Address:</b>	Hardturmstrasse 201, 8021 Zürich
<b>Contact details:</b>	Martin Walder, SIX BBS
<b>Your reference:</b>	SEPA-2025-CR-Name
<b>Scheme and document and version number:</b>	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2023 SEPA Credit Transfer Rulebook EPC004-16 2023 SEPA Instant Credit Transfer Rulebook EPC016-06 2023 SEPA Direct Debit Core Rulebook EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook
<b>Request Date:</b>	14.12.2023
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

Change Cycle November 2025

## 1.2. Description of the change request:

This change request is linked to the potential change of the implementation of the structured address. If the hybrid address is not introduced or another decision is taken in regards of the structured address (e.g. postponement to a later change cycle), this CR becomes obsolete.

Preliminary explanation:

Based on section 0.5.1 SEPA Credit Transfer Scheme Implementation Guidelines (and equivalent in other rulebooks) the implementation guidelines are binding in the Customer-to-PSP space. Most Swiss PSP have already implemented the structured address based on the currently valid definition in their offering and internal application. While in the inter-PSP space the handling of the address has to be anyway less strict (e.g. supporting cross-border payment via SWIFT, bank-to-bank payments, cash-legs of other types of transaction), the rules in the Customer-to-PSP space are often implement more restrictively.

Change request (in case the content of the address of the involved parties was changed from structured to hybrid):

The hybrid address becomes only mandatory in the inter-PSP space. In the Customer-to-PSP space, the respective PSP is not obliged to support the hybrid address and can restrict its offering to structured address only.

## 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

No impact.

2. Impact on the inter-PSP space:

No impact. PSPs can still use the hybrid address, e.g. to fulfil their compliance obligation.

3. Impact on other payment stakeholders:

Clients might have to follow a more restrictive validation of the address for the beneficiary (SCT, SCT Inst, OCT Inst) or the debtor (SDD, SDD business) when initiating a payment. Nevertheless, the impact is minor as those addresses are commonly already covered by the fully structured address.

The PSP, which already supports structured address with its solutions and applications do not have to adapt.



4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

The preferred solution is, that the element “AdrLine”, which is the added element in the hybrid address and the sole difference to the fully structured address, becomes an optional part only in the Inter-PSP-Guidelines (yellow field), but remains a white field in the Customer-to-Bank-Guidelines.

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

This change request is linked to “5.2 Compliance with the Rulebook”, point 3 “The SEPA Credit Transfer Scheme Customer-to-PSP Implementation Guidelines when as Originator PSP it offers to its Originators the service of accepting and processing electronically bundled Customer-to-PSP Credit Transfer Instructions;”

6. The nature of the change request:

- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

Option 1: the respective section in the rulebook might be changed in order restrict the binding in the Customer-to-PSP space.

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

Option 2 (preferred): the changed attributes (hybrid address) are implemented only in the inter-PSP guidelines.



## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	<b>YES</b>
Is the change request supported by a cost-benefit analysis?	<b>YES</b> PSP already using the structured address in their application and channels do not have to change again.
Does the change fit into the strategic objectives for SEPA?	<b>YES</b> Overall, structured data are preferred.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	<b>YES</b>
Do you consider that the change request does not impede SEPA-wide interoperability?	<b>YES</b> Inter-PSP is not affected.
Do you consider that the change request is in the scope of the scheme involved?	<b>YES</b>



# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #17**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public  
Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

<b>Name of contributor:</b>	Payment Committee Switzerland
<b>Organisation:</b>	SIX Interbank Clearing Ltd
<b>Address:</b>	Hardturmstrasse 201, 8021 Zürich
<b>Contact details:</b>	Martin Walder, SIX BBS
<b>Your reference:</b>	SEPA-2025-CR-Name
<b>Scheme and document and version number:</b>	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2023 SEPA Credit Transfer Rulebook EPC004-16 2023 SEPA Instant Credit Transfer Rulebook EPC016-06 2023 SEPA Direct Debit Core Rulebook EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook
<b>Request Date:</b>	14.12.2023
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

Change Cycle November 2025

## 1.2. Description of the change request:

The implementation guidelines referred in section 0.5.1 are changed for the following attributes:

P001 The name of the Originator

P006 The name of the Originator Reference Party

E001 The name of the Beneficiary

E007 The name of the Beneficiary Reference Party

or equivalent attributes (e.g. name of the Initiation Party or Originators in context of status reason information).

There should be no limitation of the maximum length such as today (max length 70 characters. The respective element in the ISO 20022 message allows 140 characters\*.

(\*In case the element in the ISO 20022 base message allows less than 140 characters, the maximum according to the base message should be applied).

Example:

Source: SEPA Credit Transfer Inter-PSP IGs 2023 Version 1.1

2.54	1..1	FIto FICustomer Credit Transfer V08 +Credit Transfer Transaction Information ++Debtor +++Name	<p><i>SEPA Rulebook</i> AT-P001 Name of the Originator.</p> <p><i>SEPA Usage Rule(s)</i> Mandatory.</p> <p>'Name' is limited to 70 characters in length.</p> <p><b>ISO Name</b> Name</p> <p><b>ISO Definition</b> Name by which a party is known and which is usually used to identify that party.</p> <p><b>XML Tag</b> Nm</p> <p><b>Type</b> Max140Text</p> <p><b>ISO Length</b> 1 .. 140</p> <p><b>SEPA Length</b> 1 .. 70</p>
------	------	--	---

New: SEPA Length 1 .. 140, respective no SEPA limitation

## 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

No impact.

2. Impact on the inter-PSP space:

The respective elements have to be changed and supported by all CSMs and PSPs. With this change, the SEPA IGs will be aligned with CBPR+ (SWIFT) and other market practices.



3. Impact on other payment stakeholders:

The respective elements have to be changed supported by all clients and PSPs.

With this change, the clients and PSPs have no difference between a SEPA payment and cross-border payment based on CBPR+ (SWIFT) for static reference data.

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

Delete SEPA restriction and use ISO definitions for the respective elements.

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

n/a

6. The nature of the change request:

- a. Change all implementation guidelines and change the maximal length of the respective elements.

Add an optional attribute

- b. n/a)

Add an rule in regards of responses.

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	<b>YES</b>
Is the change request supported by a cost-benefit analysis?	<b>YES</b> reference/client data can be used for SEPA in the same way as for other market practices
Does the change fit into the strategic objectives for SEPA?	<b>YES</b> reference/client data can be used for SEPA in the same way as for other market practices
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	<b>YES,</b> the affected elements are already in use with CBPR+ (SWIFT) without restriction of length
Do you consider that the change request does not impede SEPA-wide interoperability?	<b>YES</b> changes supports interoperability
Do you consider that the change request is in the scope of the scheme involved?	<b>YES</b>

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #19**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public

Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu) by 31 December 2023**

<b>Name of contributor:</b>	Spanish Banking Community
<b>Organisation:</b>	Spanish Banking Community
<b>Address:</b>	
<b>Contact details:</b>	<a href="mailto:macarvallo@aebanca.es">macarvallo@aebanca.es</a> ; <a href="mailto:jcastill@cecabank.es">jcastill@cecabank.es</a> ; <a href="mailto:secretariageneral@unacc.es">secretariageneral@unacc.es</a> ; <a href="mailto:altorio@gruposantander.com">altorio@gruposantander.com</a> ; <a href="mailto:fxherrero@caixabank.com">fxherrero@caixabank.com</a> ; <a href="mailto:imerchan@gruposantander.es">imerchan@gruposantander.es</a> ;
<b>Your reference:</b>	<b>Recovery of funds from fraudulent transfers</b>
<b>Scheme and document and version number:</b>	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2023 SEPA Credit Transfer Rulebook EPC004-16 2023 SEPA Instant Credit Transfer Rulebook
<b>Request Date:</b>	<b>20/12/2023</b>
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

November 2025 (next Rulebook)

## 1.2. Description of the change request:

In order to contribute to increase the recovery of funds of fraudulent origin in SCT Inst and SCT, as a good practice for all SEPA participants, we propose the adoption of a specific procedure for the processing of partial returns for those cases in which the beneficiary entity does not have sufficient funds to meet a request for the reversal, due to fraud previously sent by the payer entity and referring to an unauthorized payment transaction, as defined in guideline 1.1.a of Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market.

Thus, when the beneficiary PSP does not have sufficient available balance to face the return of funds that the payer entity has previously claimed, by sending the request for retrocession due to fraud, it must:

- 1) respond negatively to the retrocession request for “FRAD” reasons, indicating the following reason code for the denial: “AM04 – insufficient funds”.
- 2) subsequently, reimburse the ordering entity the amount corresponding to the funds available. To do this, the beneficiary PSP must issue a new transfer indicating in the payment category purpose the reason code “OTHR”, and in the payment purpose the reason code “REFU” in order to identify the nature of that transfer.

In addition, the originator's reference in the new transfer must be the reference relating to the original retrocession request.

## 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

No impact

2. Impact on the inter-PSP space:

Yes. Both Originator PSP and the Beneficiary PSP should update their processes to adjust the tags that unambiguously identify that the new transfer is a consequence of a request for cancellation on FRAD reason.

3. Impact on other payment stakeholders:

No impact.

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):



No impact

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

No impact

6. The nature of the change request:

A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	<b>YES</b>
Is the change request supported by a cost-benefit analysis?	<b>NO</b>
Does the change fit into the strategic objectives for SEPA?	<b>YES</b>
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	<b>YES</b>
Do you consider that the change request does not impede SEPA-wide interoperability?	<b>YES</b>
Do you consider that the change request is in the scope of the scheme involved?	<b>YES</b>

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #20**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public  
Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

<b>Name of contributor:</b>	Slovak Banking Association
<b>Organisation:</b>	Slovak Banking Association
<b>Address:</b>	Mytna 48, Bratislava
<b>Contact details:</b>	Eva Horvathova, <a href="mailto:eva.horvathova@sbaonline.sk">eva.horvathova@sbaonline.sk</a>
<b>Your reference:</b>	
<b>Scheme and document and version number:</b>	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2023 SEPA Credit Transfer Rulebook EPC004-16 2023 SEPA Instant Credit Transfer Rulebook <del>EPC016-06 2023 SEPA Direct Debit Core Rulebook</del> <del>EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook</del> <del>EPC158-22 2023 One Leg Out Instant Credit Transfer Rulebook</del>
<b>Request Date:</b>	18 Dec 2023
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

November 2025 Rulebook release

## 1.2. Description of the change request:

Currently there is no reason code used in camt.056 RFRO to cover situation when the ordering client was victim of a fraud. The reason code FRAD is now possible to use only in camt.056 that is initiated by the Originator PSP.

Therefore we suggest to add to existing reason codes in camt.056 - "AC03" (Wrong IBAN), "AM09" (Wrong Amount) and "CUST" (Requested By Customer) a new type of reason code for cases when the customer claims fraudulent transaction.

This new reason code will enable beneficiary PSPs to ease the evaluation process and take all the necessary steps immediately.

## 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

yes

2. Impact on the inter-PSP space:

yes, applicable for all PSPs

3. Impact on other payment stakeholders:

no

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

yes – new reason code implementation

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

n/a

6. The nature of the change request:

- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

yes, new type of reason code

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)





## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	SCT, SCT <sup>Inst</sup> Scheme
Is the change request supported by a cost-benefit analysis?	no
Does the change fit into the strategic objectives for SEPA?	n/a
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	yes
Do you consider that the change request does not impede SEPA-wide interoperability?	yes
Do you consider that the change request is in the scope of the scheme involved?	yes

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #21**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public

Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

<b>Name of contributor:</b>	Maria Brogren
<b>Organisation:</b>	Nordic Payments Council
<b>Address:</b>	Box 7603, 103 94 Stockholm, Sweden
<b>Contact details:</b>	<a href="mailto:info@npcouncil.org">info@npcouncil.org</a>
<b>Your reference:</b>	N/A
<b>Scheme and document and version number:</b>	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2023 SEPA Credit Transfer Rulebook EPC004-16 2023 SEPA Instant Credit Transfer Rulebook EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook
<b>Request Date:</b>	
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

To be included in 2025 version of SCT, SCT Inst and OCT Inst Schemes.

## 1.2. Description of the change request:

The suggestion is to expand number of characters for Name from 70 to 140.

The suggestion to expand number of characters for Name from 70 to 140 (ISO have 140). Today SCT & SCT Inst and OCT Inst Schemes have a limitation of 70 characters due to historical reasons such as limitations in legacy systems. CBPR+ as Market Practice used worldwide for cross border transactions also have 140 characters.

This relates to the following attributes I NCT & NCT Inst Schemes:

- AT-P001 - The name of the Originator
- AT-P006 - The name of the Originator Reference Party
- AT-E001 - The name of the Beneficiary
- AT-E007 - The name of the Beneficiary Reference Party

It is in the Guidelines details for Name are stated (example from SCT DS-01):

2.54	1..1	FIto FICustomer Credit Transfer V08 +Credit Transfer Transaction Information ++Debtor +++Name	<p><i>SEPA Rulebook</i> AT-P001 Name of the Originator.</p> <p><i>SEPA Usage Rule(s)</i> Mandatory.</p> <p>'Name' is limited to 70 characters in length.</p> <p><b>ISO Name</b> Name</p> <p><b>ISO Definition</b> Name by which a party is known and which is usually used to identify that party.</p> <p><b>XML Tag</b> Nm</p> <p><b>Type</b> Max140Text</p> <p><b>ISO Length</b> 1 .. 140</p> <p><b>SEPA Length</b> 1 .. 70</p>
------	------	--	---

The suggestion is to extend the number of characters of the name fields for all upper-mentioned attributes from 70 to 140 characters as:

- The 2019 ISO 20022 standard foresees up to 140 characters for the 'Debtor', 'Ultimate Debtor', 'Creditor', 'Ultimate Creditor' and 'Financial Institution' name fields.
- The Cross-border Payments and Reporting Plus (CBPR+) specifications also allow 140 characters for these name fields. This allows all EPC payment schemes, and the OCT Inst scheme in particular, to be aligned with these international specifications.
- The provision of extra characters allows payment service users to enter the complete name(s) concerned. This avoids the issue of data truncation and can provide the payment service user with further transparency about the identity of the payment counterparty and/or its reference parties and the financial institution(s) involved (the latter only for the OCT Inst scheme).
- The possibility to provide the complete name(s) can support the obligations for PSPs with respect to regulatory screening and up-front verification of payment counterparty names (such as Confirmation of Payee).



The importance of expanding to 140 characters using the full ISO 20022 standard goes hand in hand with upcoming regulation such as Instant Payment Regulation for EUR Instant Payments and PSR/PSD3.

This proposed change does not impact the EPC payment scheme rulebooks themselves, but their related Customer-to-PSP and inter-PSP implementation guidelines.

### 1.3. Wherever possible, please indicate:

#### 1. Impact on the Scheme in general:

No. change is relevant for all messages but only in the Implementation Guidelines are impacted. No impact on business rules.

#### 2. Impact on the Inter-PSP space:

Yes. PSPs need to be able to handle extended number of characters for name in their systems which demand development and adjustment in legacy systems handling and processing SEPA scheme transactions. Instead of limiting the Scheme, truncation is possible for those PSPs that can't handle full ISO Standard of 140 characters.

PSPs must increase the character capacity for the various name fields in their payment initiation channels, their internal EPC payment transaction processing systems, and in their account statement and payment transaction archiving systems.

The transaction message exchange systems with other PSPs and with other inter-PSP space actors (e.g., CSMs) will have to be adapted as well to accept and to support the transmission of longer name data.

#### 3. Impact on other payment stakeholders:

Yes. They will have the opportunity to send and/or receive the full first name(s) and surname(s) or the full legal entity name of themselves, their payment counterparties, and/or of their reference parties. The truncation of long names or of name combinations (e.g., account held by multiple natural persons) can be avoided at all or strongly reduced. Instead of limiting the Scheme, truncation is possible for those PSPs that can't handle full ISO Standard of 140 characters. This gives the payment service user more transparency about the identity of its payment counterparty and/or of its reference party.

#### 4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

No impact. The 2019 version of the ISO 20022 standard already supports the transmission of up to 140 characters for the name field. The maximum SEPA length for the name field must be set from 70 to 140 characters.

#### 5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

No impact foreseen.



6. The nature of the change request:

- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a completely new Rulebook element is added alongside the existing Rulebook elements)

**Yes - Change**

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

**No**

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	<b>Yes</b> - It can provide the payment service user with further transparency about the identity of itself, the payment counterparty and/or their respective reference parties.  For the OCT Inst scheme, it is also an alignment with the specifications set for a name field under the CBPR+ usage guidelines
Is the change request supported by a cost-benefit analysis?	<b>No</b>
Does the change fit into the strategic objectives for SEPA?	<b>Yes</b> - Providing the payment end-user with more transparency is part of the work plan of the Euro Retail Payments Board (ERPB).  For the OCT Inst scheme, it also provides Euro Leg PSPs with the full or a more elaborate name about the non-Euro Leg FIs involved in the non-Euro Leg.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	<b>Yes</b> - The maximum SEPA length for the name field must be set from 70 to 140 characters.
Do you consider that the change request does not impede SEPA-wide interoperability?	<b>No</b> - It only concerns extending the data capacity of a specific message element for EPC payment scheme transactions.
Do you consider that the change request is in the scope of the scheme involved?	<b>Yes</b>

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #29**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public  
Approved

**Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by 31 December 2023**

Name of contributor:	Eric VERONNEAU
Organisation:	Groupe BPCE
Address:	
Contact details:	
Your reference:	#BPCE-All 3 CT schemes-EPC-Precisions on Recalls
Scheme and document and version number:	Highlight which EPC Scheme Rulebook(s) this change request relates to: <a href="#">EPC125-05 2023 SEPA Credit Transfer Rulebook</a> <a href="#">EPC004-16 2023 SEPA Instant Credit Transfer Rulebook</a> <a href="#">EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook</a>
Request Date:	21 December 2023
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

23 November 2025 – effectiveness date of the EPC payment scheme rulebooks concerned.

## 1.2. Description of the change request:

The change requests addresses the processing of response to Recalls in the 3 credit transfer scheme rulebooks, i.e. SCT, SCT Inst and OCT Inst, other than the positive response.

### I. Reminder of the content of the schemes :

Currently, the rulebooks indicate what is mentioned below :

#### - SCT rulebook, EPC125-05 2023

##### o under art. 4.3.2.3 Recall :

“A Recall occurs when the Originator PSP requests to cancel a SEPA Credit Transfer Transaction. [...]”

[...]

- “The Originator PSP must send out the Recall within the period of **10 Banking Business Days** for the reasons ‘Duplicate sending’ and ‘Technical problems resulting in erroneous SCTs’, and within the period of 13 months for the reason ‘Fraudulent originated SEPA Credit Transfer’ following the execution date of the initial SEPA Credit Transfer Transaction subject to the Recall;”

[...]

- “The Beneficiary PSP must provide the Originator PSP with a response to a Recall within 15 Banking Business Days following the receipt of the Recall from the Originator PSP.

The Beneficiary PSP is in breach with the Rulebook if it has not responded to the Recall by the Originator PSP within this period of 15 Banking Business Days. If the Beneficiary PSP has received no response from the Beneficiary to this Recall within these 15 Banking Business Days, the Beneficiary PSP must send a negative response with the reason “No response from the Beneficiary” to the Originator PSP;”

[...]

- **And later, under CT-02.07:** “In the exceptional case of no response from the Beneficiary PSP **within the deadline of 15 Banking Business Days** following the receipt of the Recall from the Originator PSP, the Originator PSP may send a **Request for Status Update** to the Beneficiary PSP.”

##### o But under art. 4.3.2.4 Request for Recall by the Originator

“A Request for Recall by the Originator can be initiated by the Originator PSP after an Originator has requested the Originator PSP to get the reimbursement of a settled SEPA Credit Transfer Transaction for a reason other than duplicate sending, technical problems resulting in an erroneous SEPA Credit Transfer Transaction and a fraudulently originated SEPA Credit Transfer Instruction (see section 4.3.2.3).”

[...]

- “The Beneficiary PSP must send its response to a Request for Recall by the Originator within 15 Banking Business Days following the receipt of the Request for Recall by the Originator from the Originator PSP.”



- “A Request for Status Update can refer to one single Request for Recall by the Originator, or to several Requests for Recall by the Originator.”

[...]

- **And later, under Step 4c:** “In an exceptional case of no response from the Beneficiary PSP **after 15 Banking Business Days** after the receipt of the Request for Recall by the Originator, the Originator PSP may send a **Request for Status Update** to the Beneficiary PSP”

- **SCT Inst rulebook, EPC004-16 2023**

o **Under 4.3.2.2 SCT Inst Recall**

“An **SCT Inst Recall** occurs when the Originator PSP requests to cancel an SCT Inst Transaction.”

[...]

- “The Originator PSP must send out the SCT Inst Recall within 10 Banking Business Days for the reasons ‘Duplicate sending’ and ‘Technical problems resulting in an erroneous SCT Inst’, and within the period of 13 months for the reason ‘Fraudulent originated SCT Inst’ following the execution date of the initial SCT Inst Transaction subject to the SCT Inst Recall;”

[...]

- “The Beneficiary PSP must provide the Originator PSP with a response to the SCT Inst Recall within 15 Banking Business Days following the receipt of the SCT Inst Recall from the Originator PSP.

The Beneficiary PSP is in breach with the Rulebook if it has not responded to the SCT Inst Recall by the Originator PSP within this period of 15 Banking Business Days. If the Beneficiary PSP has received no response from the Beneficiary to this SCT Inst Recall within these 15 Banking Business Days, the Beneficiary PSP must send a negative response with the reason “No response from the Beneficiary” to the Originator PSP;”

[...]

- **And later, under CT-02.07** “In the exceptional case of no response from the Beneficiary PSP **within the deadline of 15 Banking Business Days** following the receipt of the SCT Inst Recall from the Originator PSP, the Originator PSP may send a **Request for Status Update** to the Beneficiary PSP.”

- **OCT Inst rulebook, EP158-22 2023**

o **Under 4.3.4.3 OCT Inst Recall**

“An OCT Inst Recall occurs when the Euro Leg Entry PSP receives a request from the non-Euro Leg Payer’s FI to cancel an OCT Inst Transaction, or when the Euro Leg-Based Payer’s PSP makes such request to the Euro Leg Exit PSP.”

[...]

- “The Euro Leg-Based Payee’s PSP/ Euro Leg Exit PSP must provide the Euro Leg Entry PSP/ Euro Leg-Based Payer’s PSP with a response to an OCT Inst Recall within 15 SEPA Banking Business Days following the receipt of the OCT Inst Recall from the Euro Leg Entry PSP/ Euro Leg-Based Payer’s PSP;”

- “The Euro Leg-Based Payee’s PSP/ Euro Leg Exit PSP is in breach with the Scheme when it has not responded to the OCT Inst Recall request by the Euro Leg Entry PSP/ Euro Leg-Based Payer’s PSP, within this period of 15 SEPA Banking Business Days.”

[...]





- “If the Euro Leg-Based Payee’s PSP/ Euro Leg Exit PSP has received no response from the Payee/ non-Euro Leg Payee’s FI to this OCT Inst Recall within these 15 SEPA Banking Business Days, it must send a negative response with the reason “No response from the Payee”/ “No response from the non-Euro Leg Payee’s FI” to the Euro Leg Entry PSP/ Euro Leg-Based Payer’s PSP;”
- [...]
- “The Euro Leg-Based Payee’s PSP/ Euro Leg Exit PSP may exceptionally not respond **within the deadline of 15 SEPA Banking Business Days** following the receipt of the OCT Inst Recall from the Euro Leg Entry PSP/ Euro Leg-Based Payer’s PSP. The Euro Leg Entry PSP/ Euro Leg-Based Payer’s PSP may send a **Request for Status Update** to the Euro Leg-Based Payee’s PSP/ Euro Leg Exit PSP.”

## II. The issue:

One can understand from the above that

- Only one Recall can be sent for a given original transaction. Indeed, it is neither mentioned that a second Recall may be sent for this given original transaction, nor specified what could be the time line for sending such second Recall.
- Only a Request for Status Update on the Recall can be sent in the case no response would have been provided to the Recall, and not a second Recall.
- Given the fact that the response period is 15 Banking Business Days, it seems logical that it is only at the end of this period that such Status Update can be sent.
- A received negative response to a Recall, is it before at the end of the response period, is meant to be definitive and not to trigger another Recall on the same given original transaction.

The practice shows that this understanding is not shared by all participants, and this leads in some cases to:

- A second Recall sent by the Originator PSP on the same given original transaction before the end of the response period to the first one.
- A second Recall sent by the Originator PSP on the same given original transaction instead of a Request for Status Update on the first Recall at the end of the response period.
- A second or even a third Recall and more sent by the Originator PSP upon receipt of a first or even second negative response.

→ This leads to uncertainties in the process and possibly lots of unuseful (i.e. costly and time consuming) exchange.

## III. The proposed solution, highlighted in yellow:

- SCT rulebook, EPC125-05 2023

a. under art. 4.3.2.3 Recall :

“A Recall occurs when the Originator PSP requests to cancel a SEPA Credit Transfer Transaction. [...]”

[...]

- “The Originator PSP must send out the Recall within the period of 10 Banking Business Days for the reasons ‘Duplicate sending’ and ‘Technical problems resulting in erroneous SCTs’, and within the period of 13 months for the reason ‘Fraudulent originated SEPA Credit Transfer’ following the execution date of the initial SEPA Credit Transfer Transaction subject to the Recall; **Only one Recall can be sent on a given transaction over the mentioned periods”**



- [...]
- “The Beneficiary PSP must provide the Originator PSP with a response to a Recall within 15 Banking Business Days following the receipt of the Recall from the Originator PSP.
- The Beneficiary PSP is in breach with the Rulebook if it has not responded to the Recall by the Originator PSP within this period of 15 Banking Business Days. If the Beneficiary PSP has received no response from the Beneficiary to this Recall within these 15 Banking Business Days, the Beneficiary PSP must send a negative response with the reason “No response from the Beneficiary” to the Originator PSP; Sending another Recall on the same initial SCT after the Beneficiary PSP has provided a response is not allowed.”
- [...]
- “In the exceptional case of no response from the Beneficiary PSP ~~within at the end of the deadline of 15 Banking Business Days period~~ following the receipt of the Recall from the Originator PSP, the Originator PSP may send a Request for Status Update to the Beneficiary PSP. Sending a second Recall on the same original SCT is not allowed.”

[...]

- And later, under CT-02.07: “In the exceptional case of no response from the Beneficiary PSP ~~within the deadline of 15 Banking Business Days following the receipt of the Recall from the Originator PSP,~~ the Originator PSP may send a Request for Status Update to the Beneficiary PSP. [...].”

b. And under art. 4.3.2.4 Request for Recall by the Originator

“A Request for Recall by the Originator can be initiated by the Originator PSP after an Originator has requested the Originator PSP to get the reimbursement of a settled SEPA Credit Transfer Transaction for a reason other than duplicate sending, technical problems resulting in an erroneous SEPA Credit Transfer Transaction and a fraudulently originated SEPA Credit Transfer Instruction (see section 4.3.2.3).”

[...]

- Only one Recall can be sent on a given transaction over the mentioned periods”
- “The Beneficiary PSP must send its response to a Request for Recall by the Originator within 15 Banking Business Days following the receipt of the Request for Recall by the Originator from the Originator PSP. Sending another Recall on the same initial SCT after the Beneficiary PSP has provided a response is not allowed.”
- [...]
- “In an exceptional case of no response from the Beneficiary PSP ~~after~~ **at the end of the 15 Banking Business Days period** after the receipt of the Request for Recall by the Originator, the Originator PSP may send a **Request for Status Update** to the Beneficiary PSP”. Sending a second Request for Recall by the Originator on the same original SCT is not allowed.”

[...]

- And later, under Step 4c: “In an exceptional case of no response from the Beneficiary PSP ~~after 15 Banking Business Days after the receipt of the~~



~~Request for Recall by the Originator~~, the Originator PSP may send a **Request for Status Update** to the Beneficiary PSP”

- **SCT Inst rulebook**, EPC004-16 2023

c. Under 4.3.2.2 SCT Inst Recall

“An **SCT Inst Recall** occurs when the Originator PSP requests to cancel an SCT Inst Transaction.”

[...]

- “The Originator PSP must send out the SCT Inst Recall within 10 Banking Business Days for the reasons ‘Duplicate sending’ and ‘Technical problems resulting in an erroneous SCT Inst’, and within the period of 13 months for the reason ‘Fraudulent originated SCT Inst’ following the execution date of the initial SCT Inst Transaction subject to the SCT Inst Recall; **Only one Recall can be sent on a given transaction over the mentioned periods”**
- [...]
- “The Beneficiary PSP must provide the Originator PSP with a response to the SCT Inst Recall within 15 Banking Business Days following the receipt of the SCT Inst Recall from the Originator PSP.
- The Beneficiary PSP is in breach with the Rulebook if it has not responded to the SCT Inst Recall by the Originator PSP within this period of 15 Banking Business Days. If the Beneficiary PSP has received no response from the Beneficiary to this SCT Inst Recall within these 15 Banking Business Days, the Beneficiary PSP must send a negative response with the reason “No response from the Beneficiary” to the Originator PSP; **Sending another Recall on the same initial SCT after the Beneficiary PSP has provided a response is not allowed.”**
- [...]
- “In the exceptional case of no response from the Beneficiary PSP ~~within the~~ **end deadline of the 15 Banking Business Days period** following the receipt of the SCT Inst Recall from the Originator PSP, the Originator PSP may send a **Request for Status Update** to the Beneficiary PSP. Sending a second Request for Recall by the Originator on the same original SCT is not allowed.”

[...]

- ~~And later, under CT-02.07: “In the exceptional case of no response from the Beneficiary PSP **within the deadline of 15 Banking Business Days** following the receipt of the SCT Inst Recall from the Originator PSP,~~ the Originator PSP may send a **Request for Status Update** to the Beneficiary PSP.”

- **OCT Inst rulebook**, EP158-22 2023

d. Under 4.3.4.3 OCT Inst Recall

“An OCT Inst Recall occurs when the Euro Leg Entry PSP receives a request from the non-Euro Leg Payer’s FI to cancel an OCT Inst Transaction, or when the Euro Leg-Based Payer’s PSP makes such request to the Euro Leg Exit PSP. **Only one Recall can be sent on a given transaction”**

[...]

- “The Euro Leg-Based Payee’s PSP/ Euro Leg Exit PSP must provide the Euro Leg Entry PSP/ Euro Leg-Based Payer’s PSP with a response to an OCT Inst Recall within 15 SEPA Banking Business Days following the receipt of the OCT Inst Recall from the Euro Leg Entry PSP/ Euro Leg-Based Payer’s PSP;



The Euro Leg-Based Payee's PSP/ Euro Leg Exit PSP is in breach with the Scheme when it has not responded to the OCT Inst Recall request by the Euro Leg Entry PSP/ Euro Leg-Based Payer's PSP, **within at the end of** this period of 15 SEPA Banking Business Days. **Sending another Recall on the same initial SCT after the Beneficiary PSP has provided a response is not allowed."**

- [...]
  - "If the Euro Leg-Based Payee's PSP/ Euro Leg Exit PSP has received no response from the Payee/ non-Euro Leg Payee's FI to this OCT Inst Recall within these 15 SEPA Banking Business Days, it must send a negative response with the reason "No response from the Payee"/ "No response from the non-Euro Leg Payee's FI" to the Euro Leg Entry PSP/ Euro Leg-Based Payer's PSP; **Sending a second Request for Recall by the Originator on the same original SCT is not allowed."**
  - [...]
  - The Euro Leg-Based Payee's PSP/ Euro Leg Exit PSP may exceptionally not **have responded within at the end deadline of the 15 SEPA Banking Business Days period** following the receipt of the OCT Inst Recall from the Euro Leg Entry PSP/ Euro Leg-Based Payer's PSP. The Euro Leg Entry PSP/ Euro Leg-Based Payer's PSP may send a **Request for Status Update** to the Euro Leg-Based Payee's PSP/ Euro Leg Exit PSP. **Sending a second Request for Recall by the Originator on the same original SCT is not allowed."**
- [...]
- **Add a Step 07, "In the exceptional case of no response from the Euro Leg-Based Payee's PSP, the Euro Leg Exit PSP may send a Request for Status Update to the Euro Leg-Based Payee's PSP."**

### 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

**The impact is limited to the inter-PSP space.**

2. Impact on the inter-PSP space:

**Yes. This change will impact the rules and therefore potentially all EPC payment scheme participants.**

3. Impact on other payment stakeholders:

**No. This change does not impact non-scheme participants. End users are not impacted.**

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

**No, not as such, but it could be useful to remind in the introduction section of the Recall message (and possibly the RFRO message) in the IGs that only one Recall can be send for a given original transaction. This can only be of help for the implementors.**

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

**No impact.**



6. The nature of the change request:

- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

**Yes, it is a precision on existing requirements.**

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

**No.**

## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	<b>YES. The change request applies to all scheme participants SEPA wide.</b>
Is the change request underpinned by a cost-benefit analysis?	<b>NO.</b>
Does the change fit into the strategic objectives for SEPA?	<b>YES. Clarity on processing of the answers to Recalls can only participate to a smoother processing SEPA wide.</b>
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	<b>YES.</b>
Do you consider that the change request does not impede SEPA-wide interoperability?	<b>NO. On the contrary, clarifying rules can only help to a better interoperability</b>
Do you consider that the change request is in the scope of the schemes involved?	<b>YES.</b>

# Template for Proposing a Change Request in an EPC Payment Scheme



European Payments Council

EPC 164-21  
Version 1.1  
28 March 2023

**CR #31**

European Payments Council AISBL  
Cours Saint-Michel, 30 - B - 1040 Brussels  
T +32 2 733 35 33  
Entreprise N°0873.268.927  
secretariat@epc-cep.eu

Public

Approved

Submit your responses by e-mail to [change-request.EPC-scheme@epc-cep.eu](mailto:change-request.EPC-scheme@epc-cep.eu)  
by **31 December 2023**

<b>Name of contributor:</b>	Slovak Banking Association
<b>Organisation:</b>	Slovak Banking Association
<b>Address:</b>	Mytna 48, Bratislava, Slovakia
<b>Contact details:</b>	Eva Horvathova, <a href="mailto:eva.horvathova@sbaonline.sk">eva.horvathova@sbaonline.sk</a>
<b>Your reference:</b>	
<b>Scheme and document and version number:</b>	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2023 SEPA Credit Transfer Rulebook EPC004-16 2023 SEPA Instant Credit Transfer Rulebook <del>EPC016-06 2023 SEPA Direct Debit Core Rulebook</del> <del>EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook</del> <del>EPC158-22 2023 One Leg Out Instant Credit Transfer Rulebook</del>
<b>Request Date:</b>	18 Dec 2023
<b>For information:</b>	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the EPC Payment Schemes in accordance with the rules set out in the document 'EPC Payment Scheme Management Rules' available on the <a href="#">EPC Website</a> .



# 1. General Description of the Change Request

## 1.1. Suggested launch date (if any):

November 2025 Rulebook release

## 1.2. Description of the change request:

Currently there is no XML message type used in SEPA schemes to cover situation when additional information between banks have to be exchanged, like identification details of the client or any other information/details from compliance request.

Today we can send only SWIFT format of such queries (MT19x, MT99x) which is not aimed way of communication related to SEPA payments. The aim of this request is to handle all SEPA messages and communication via the same SEPA channel.

Therefore we suggest to introduce a new type of XML message to the SEPA SCT and SEPA SCT<sup>Inst</sup> Rulebooks to enable PSPs to exchange such type of information.

## 1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

yes

2. Impact on the inter-PSP space:

yes, applicable for all PSPs

3. Impact on other payment stakeholders:

no

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

yes – new XML message type(s) implementation

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks:

n/a

6. The nature of the change request:

a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

yes, new type of message

b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)



## 2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide adoption?	SCT, SCT <sup>Inst</sup> Scheme
Is the change request supported by a cost-benefit analysis?	no
Does the change fit into the strategic objectives for SEPA?	n/a
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	yes
Do you consider that the change request does not impede SEPA-wide interoperability?	yes
Do you consider that the change request is in the scope of the scheme involved?	yes