

Position of the Scheme End-User Multi-Stakeholder Group (SEU MSG) on the 2024 PSEMWG and OLO TF Change Proposals for the EPC Payment Scheme Rulebooks

EPC 179-24
Version 1.0
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Public



1. Background

All submitted change requests to modify the EPC payment scheme rulebooks during the 2024 EPC Payment Scheme Rulebook Change Management Cycle were published for a three-month public consultation between 12 March and 09 June 2024.

Following this three-month public consultation, the EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG) and the EPC One-Leg Out Task Force (OLO TF) collected and consolidated the comments received from all scheme participants and stakeholders for the four SEPA payment scheme rulebooks and the One-leg Out Instant Credit Transfer (OCT Inst) scheme rulebook during this public consultation. The PSEMWG and OLO TF analysed the comments received for each relevant change request. They then developed Change Proposals based on the level of support and the comments received from the public consultation.

The PSEMWG and the OLO TF consolidated their respective Change Proposals, along with each change request and the related non-confidential comments received from the contributors during the public consultation, in a Change Proposal Submission Document per EPC payment scheme rulebook:

- EPC 124-24 v0.2 for the SEPA Credit Transfer (SCT) scheme rulebook
- EPC 125-24 v0.2 for the SEPA Instant Credit Transfer (SCT Inst) scheme rulebook
- EPC 126-24 v0.2 for the SEPA Direct Debit (SDD) Core scheme rulebook
- EPC 127-24 v0.2 for the SDD Business-to-Business (B2B) scheme rulebook
- EPC 128-24 v0.2 for the OCT Inst scheme rulebook

The above-mentioned versions of the Change Proposal Submission Documents were then submitted to the August 2024 meetings of the Scheme End-User Multi-Stakeholder Group (SEU MSG) and the EPC Scheme Technical Player Multi-Stakeholder group (STP MSG) (i.e. the EPC Stakeholder Fora), and to the September 2024 meeting of the EPC Payment Scheme Management Board (PSMB).

2. Role of the EPC Stakeholder Fora during the EPC Payment Scheme Rulebook Change Management Cycle

Section 4.4 of the EPC Payment Scheme Management Rules indicates that the SEU MSG and the STP MSG are each separately invited to provide their consolidated comments in a position document on the change requests and on the related Change Proposals outlined in the Change Proposal Submission Documents. Their respective position documents will be shared with the PSMB.

The PSMB will then deliberate on the Change Proposal Submission Documents from the PSEMWG and the OLO TF, and the position documents from the SEU MSG and the STP MSG. The PSMB shall finally determine whether to accept or not a Change Proposal after consideration of the position from the EPC Stakeholder Fora in accordance with section 4.2.5 of the EPC Payment Scheme Management Rules.

EPC179-24 SEU MSG position on 2024 PSEMWG and OLO TF Change Proposals for the EPC payment scheme rulebooks

This SEU MSG position document will be published on the EPC Website together with the final versions of the Change Proposal Submission Documents which will include the decision of the PSMB on each Change Proposal.



3. SEU MSG position on 2024 PSEMWG Change Proposals – SCT Scheme Rulebook

Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
1	Change request has been withdrawn	This change request has been withdrawn.	Not applicable.
2	Inclusion of Alias and Proxy Definitions	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2025 SCT rulebook version 1.0.	Supports the PSEMWG Change Proposal.
4	Change request has been withdrawn	This change request has been withdrawn.	Not applicable.
5	Change request has been withdrawn	This change request has been withdrawn.	Not applicable.
6	Introduction of Hybrid Address of the Payment End-User	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2025 SCT rulebook version 1.0.	Supports the PSEMWG Change Proposal.
9	Introduce pacs.009 to Replace pacs.008 for Inter-PSP Transactions	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SCT rulebook version 1.0.	Supports the PSEMWG Change Proposal.
10	Possibility for Beneficiary to return a SCT (Inst) Transaction after the Amount is Credited	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SCT rulebook version 1.0.	Supports the PSEMWG Change Proposal.



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
11	Extension of Character Length for Name	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting).</p> <p>One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain.</p> <p>Not to be included in the 2025 SCT rulebook version 1.0.</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>
12	Inclusion of Commercial Trade Name	<p>A majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p>	<p>Supports the PSEMWG Change Proposal. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021</p>



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
		<p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities remark that this change request does not indicate how it will be implemented, or see insufficient business value in this change request for payment service users.</p> <p>One community also expects a large impact on various initiation and reporting channels, transaction processing systems and databases used by the EPC payment scheme participants. As PSPs have to allocate their resources for all regulatory changes stemming from the amended SEPA Regulation, there is no capacity left to implement this change nor any other change related to the upgrade of existing or the inclusion of new attributes.</p> <p>The PSEMWG points out that there are legislative initiatives (e.g., amended SEPA Regulation, the upcoming Payment Services Regulation) making formal references to Commercial Trade Names.</p> <p>To be included in the 2025 SCT rulebook version 1.0.</p> <p>The PSEMWG is well aware that the 2019 ISO version does not foresee a dedicated field for the Commercial Trade Name. It does only see the Remittance Information attribute as the most suitable field for the time being. As a follow-up action, the PSEMWG would then approach ISO for asking a concrete solution under the ISO 20022 standard.</p>	<p>to increase the transparency for retail payment end-users. The ideal implementation approach is to firstly submit a change request to ISO 20022 to foresee a dedicated message element for this information. However, this will take time for ISO 20022 to assess and hopefully accept such change request. Moreover, the SEPA payment scheme rulebooks would also have to migrate to a newer ISO 20022 version. This can only be achieved by end 2027 at the earliest. To cover this transition period, a workaround for transporting the Commercial Trade Name must be found. The SEU MSG does not support the use of the Remittance Information (RI) message element as workaround. Payment end-users in some communities already extensively use the RI message element for other purposes. As an alternative, the SEU MSG suggestion to the EPC is to use the existing message elements ‘Name of the Payee Reference Party’ and</p>



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
			<p>'Name of the Payer Reference Party' to transport the Commercial Trade Name information.</p>
<p>13</p>	<p>Inclusion of Reference Party Address</p>	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or does support it <u>provided that the attribute is optional and does not imply any obligation</u> for the PSPs to manage this information (e.g., for the Originator PSP to acquire it from the payment service user for KYC purposes, to transport it further into the Inter-PSP space, and for the Beneficiary PSP to accept and to process it). These national communities of EPC payment scheme participants state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting). One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received. Some of its members expressed concerns about the 'yellow optional' characteristic of the proposed attribute. This would mean that all PSPs would have to adapt their systems to support this extra attribute.</p> <p>Not to be included in the 2025 SCT rulebook version 1.0.</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Not opening the Reference Party Address message elements for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification under ISO 20022. Payment end-users should have the possibility to insert such information in the payment message.</p>



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
15	Optional use of Unique End-to-end Transaction Reference (UETR)	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SCT rulebook version 1.0.	Supports the PSEMWG Change Proposal.
16	Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SCT rulebook version 1.0.	Supports the PSEMWG Change Proposal.
17	Extension of Character Length for Name	The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request. These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting). One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or	Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus



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		<p>to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain.</p> <p>Not to be included in the 2025 SCT rulebook version 1.0.</p>	<p>(CBPR+) specifications-based payments.</p>
19	<p>Partial Transfer Back of Funds in case of Reason 'Fraud'</p>	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 SCT rulebook version 1.0.</p>	<p>Supports the PSEMWG Change Proposal.</p>
20	<p>Extra Reason Code 'Fraud' for Request For Recall by the Originator (RFRO)</p>	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 SCT rulebook version 1.0.</p>	<p>Supports the PSEMWG Change Proposal.</p>
21	<p>Extension of Character Length for Name</p>	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for</p>



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		<p>services (e.g., account statements, payment reporting). One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain.</p> <p>Not to be included in the 2025 SCT rulebook version 1.0.</p>	<p>the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>
29	<p>Precisions on Recalls and Status Requests on Recalls</p>	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2025 SCT rulebook version 1.0.</p>	<p>Supports the PSEMWG Change Proposal.</p>
31	<p>New XML Message Type to Exchange Extra Info between PSPs</p>	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 SCT rulebook version 1.0.</p>	<p>Supports the PSEMWG Change Proposal.</p>



4. SEU MSG position on 2024 PSEMWG Change Proposals - SCT Inst Scheme Rulebook

Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
1	Change request has been withdrawn	Change request has been withdrawn.	Not applicable.
2	Inclusion of Alias and Proxy Definitions	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2025 SCT Inst rulebook version 1.0.	Supports the PSEMWG Change Proposal.
3	New Entry-Into-Force Time of the SCT Inst and OCT Inst Scheme Rulebooks as of November 2025	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2025 SCT Inst rulebook version 1.0.	Supports the PSEMWG Change Proposal.
4	Change request has been withdrawn	Change request has been withdrawn.	Not applicable.
5	Change request has been withdrawn	Change request has been withdrawn.	Not applicable.
6	Introduction of Hybrid Address of the Payment End-User	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2025 SCT Inst rulebook version 1.0.	Supports the PSEMWG Change Proposal.
7	Unique Format of Acceptance Date Time Timestamp	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that only the first part of this change request (i.e. the attribute AT-T056 being the timestamp must be unambiguous and at least include milliseconds) can be part of the scheme. Only the first part of this change request to be included in the 2025 SCT	Supports the PSEMWG Change Proposal.



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		<p>Inst rulebook version 1.0. As for the suggestion for the exclusive use of one “ISODatetime” format for the SCT Inst timestamp, not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	
9	Introduce pacs.009 to Replace pacs.008 for Inter-PSP Transactions	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	Supports the PSEMWG Change Proposal.
10	Possibility for Beneficiary to return a SCT (Inst) Transaction after the Amount is Credited	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	Supports the PSEMWG Change Proposal.
11	Extension of Character Length for Name	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request. These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting). One of these national communities further points out that the scheme</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment</p>



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		<p>participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain.</p> <p>Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	<p>end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>
12	Inclusion of Commercial Trade Name	<p>A majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities remark that this change request does not indicate how it will be implemented, or see insufficient business value in this change request for payment service users.</p> <p>One community also expects a large impact on various initiation and reporting channels, transaction processing systems and databases used by the EPC payment scheme participants. As PSPs have to allocate their resources for all regulatory changes stemming from the amended SEPA Regulation, there is no capacity left to implement this change nor any other change related to the upgrade of existing or the inclusion of new attributes.</p> <p>The PSEMWG points out that there are legislative initiatives (e.g., amended SEPA Regulation, the upcoming Payment Services Regulation)</p>	<p>Supports the PSEMWG Change Proposal. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. The ideal implementation approach is to firstly submit a change request to ISO 20022 to foresee a dedicated message element for this information. However, this will take time for ISO 20022 to assess and hopefully accept such change request. Moreover, the SEPA payment scheme rulebooks would also have to migrate to a newer ISO 20022 version. This can only be achieved by end 2027 at the earliest. To cover this transition period, a workaround for</p>



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
		<p>making formal references to Commercial Trade Names. To be included in the 2025 SCT Inst rulebook version 1.0. The PSEMWG is well aware that the 2019 ISO version does not foresee a dedicated field for the Commercial Trade Name. It does only see the Remittance Information attribute as the most suitable field for the time being. As a follow-up action, the PSEMWG would then approach ISO for asking a concrete solution under the ISO 20022 standard.</p>	<p>transporting the Commercial Trade Name must be found. The SEU MSG does not support the use of the Remittance Information (RI) message element as workaround. Payment end-users in some communities already extensively use the RI message element for other purposes. As an alternative, the SEU MSG suggestion to the EPC is to use the existing message elements ‘Name of the Payee Reference Party’ and ‘Name of the Payer Reference Party’ to transport the Commercial Trade Name information.</p>
13	Inclusion of Reference Party Address	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or does support it <u>provided that the attribute is optional and does not imply any obligation</u> for the PSPs to manage this information (e.g., for the Originator PSP to acquire it from the payment service user for KYC purposes, to transport it further into the Inter-PSP space, and for the Beneficiary PSP to accept and to process it). These national communities of EPC payment scheme participants state that this change request will have a significant impact on the whole</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Not opening the Reference Party Address message elements for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification under ISO 20022.</p>



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		<p>payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting).</p> <p>One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received. Some of its members expressed concerns about the ‘yellow optional’ characteristic of the proposed attribute. This would mean that all PSPs would have to adapt their systems to support this extra attribute.</p> <p>Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	<p>Payment end-users should have the possibility to insert such information in the payment message.</p>
15	Optional use of Unique End-to-end Transaction Reference (UETR)	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	<p>Supports the PSEMWG Change Proposal.</p>
16	Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	<p>Supports the PSEMWG Change Proposal.</p>
17	Extension of Character Length for Name	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB)</p>



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		<p>scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting).</p> <p>One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain.</p> <p>Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	<p>recommendations issued in 2021 to increase the transparency for retail payment end-users.</p> <p>Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>
18	Reduction of target maximum execution time and time-out deadline	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation.</p> <p>The PSEMWG does not propose a concrete change proposal. A regulatory change to the SCT Inst scheme sub-timelines is necessary in light of the contents of the Instant Payments Regulation (IPR) that amends the SEPA Regulation.</p>	Supports the PSEMWG Change Proposal.



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
19	Partial Transfer Back of Funds in case of Reason 'Fraud'	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	Supports the PSEMWG Change Proposal.
20	Extra Reason Code 'Fraud' for Request For Recall by the Originator (RFRO)	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	Supports the PSEMWG Change Proposal.
21	Extension of Character Length for Name	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting).</p> <p>One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus</p>



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
		to the inclusion of new rulebook attributes. The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain. Not to be included in the 2025 SCT Inst rulebook version 1.0.	(CBPR+) specifications-based payments.
26	Possibility of Payment Reversal in the Inter-PSP Space	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SCT Inst rulebook version 1.0.	Supports the PSEMWG Change Proposal.
27	Call for More Suitable Date and Time for Rulebook Version Change-Over (with no downtime)	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2025 SCT Inst rulebook version 1.0.	Supports the PSEMWG Change Proposal.
29	Precisions on Recalls and Status Requests on Recalls	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2025 SCT Inst rulebook version 1.0.	Supports the PSEMWG Change Proposal.
31	New XML Message Type to Exchange Extra Info between PSPs	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SCT Inst rulebook version 1.0.	Supports the PSEMWG Change Proposal.



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
32	Optional use of Unique End-to-end Transaction Reference (UETR)	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 SCT Inst rulebook version 1.0.</p>	Supports the PSEMWG Change Proposal.



5. SEU MSG position on 2024 PSEMWG Change Proposals - SDD Core Scheme Rulebook

Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
6	Introduction of Hybrid Address of the Payment End-User	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2025 SDD Core rulebook version 1.0.	Supports the PSEMWG Change Proposal.
8	Extension of Time Limit for initiating a SDD Reversal	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SDD Core rulebook version 1.0.	Supports the PSEMWG Change Proposal.
11	Extension of Character Length for Name	The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request. These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting). One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or	Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
		<p>any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain.</p> <p>Not to be included in the 2025 SDD Core rulebook version 1.0.</p>	<p>Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>
12	Inclusion of Commercial Trade Name	<p>A majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities remark that this change request does not indicate how it will be implemented, or see insufficient business value in this change request for payment service users.</p> <p>One community also expects a large impact on various initiation and reporting channels, transaction processing systems and databases used by the EPC payment scheme participants. As PSPs have to allocate their resources for all regulatory changes stemming from the amended SEPA Regulation, there is no capacity left to implement this change nor any other change related to the upgrade of existing or the inclusion of new attributes.</p> <p>The PSEMWG points out that there are legislative initiatives (e.g., amended SEPA Regulation, the upcoming Payment Services Regulation) making formal references to Commercial Trade Names.</p> <p>For inclusion in the 2025 SDD Core rulebook version 1.0.</p> <p>The PSEMWG is well aware that the 2019 ISO version does not foresee a</p>	<p>Supports the PSEMWG Change Proposal. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. The ideal implementation approach is to firstly submit a change request to ISO 20022 to foresee a dedicated message element for this information. However, this will take time for ISO 20022 to assess and hopefully accept such change request. Moreover, the SEPA payment scheme rulebooks would also have to migrate to a newer ISO 20022 version. This can only be achieved by end 2027 at the earliest. To cover this transition period, a workaround for transporting the Commercial Trade Name must be found. The SEU MSG does not support the</p>



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
		<p>dedicated field for the Commercial Trade Name. It does only see the Remittance Information attribute as the most suitable field for the time being. As a follow-up action, the PSEMWG would then approach ISO for asking a concrete solution under the ISO 20022 standard.</p>	<p>use of the Remittance Information (RI) message element as workaround. Payment end-users in some communities already extensively use the RI message element for other purposes. As an alternative, the SEU MSG suggestion to the EPC is to use the existing message elements ‘Name of the Payee Reference Party’ and ‘Name of the Payer Reference Party’ to transport the Commercial Trade Name information.</p>
13	Inclusion of Reference Party Address	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or does support it provided that the attribute is optional and does not imply any obligation for the PSPs to manage this information (e.g., for the Creditor PSP to acquire it from the payment service user for KYC purposes, to transport it further into the Inter-PSP space, and for the Debtor PSP to accept and to process it).</p> <p>These national communities of EPC payment scheme participants state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Not opening the Reference Party Address message elements for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification under ISO 20022. Payment end-users should have the possibility to insert such</p>



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
		<p>reporting).</p> <p>One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received. Some of its members expressed concerns about the ‘yellow optional’ characteristic of the proposed attribute. This would mean that all PSPs would have to adapt their systems to support this extra attribute.</p> <p>Not to be included in the 2025 SDD Core rulebook version 1.0.</p>	<p>information in the payment message.</p>
16	Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 SDD Core rulebook version 1.0.</p>	<p>Supports the PSEMWG Change Proposal.</p>
17	Extension of Character Length for Name	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a</p>



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		<p>the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting). One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes. The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain. Not to be included in the 2025 SDD Core rulebook version 1.0.</p>	<p>globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>



6. SEU MSG position on 2024 PSEMWG Change Proposals - SDD B2B Scheme Rulebook

Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
6	Introduction of Hybrid Address of the Payment End-User	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2025 SDD B2B rulebook version 1.0.	Supports the PSEMWG Change Proposal.
8	Extension of Time Limit for initiating a SDD Reversal	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SDD B2B rulebook version 1.0.	Supports the PSEMWG Change Proposal.
11	Extension of Character Length for Name	The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request. These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting). One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or	Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
		<p>any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes.</p> <p>The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain.</p> <p>Not to be included in the 2025 SDD B2B rulebook version 1.0.</p>	<p>Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>
12	Inclusion of Commercial Trade Name	<p>A majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities remark that this change request does not indicate how it will be implemented, or see insufficient business value in this change request for payment service users.</p> <p>One community also expects a large impact on various initiation and reporting channels, transaction processing systems and databases used by the EPC payment scheme participants. As PSPs have to allocate their resources for all regulatory changes stemming from the amended SEPA Regulation, there is no capacity left to implement this change nor any other change related to the upgrade of existing or the inclusion of new attributes.</p> <p>The PSEMWG points out that there are legislative initiatives (e.g., amended SEPA Regulation, the upcoming Payment Services Regulation) making formal references to Commercial Trade Names.</p> <p>To be included in the 2025 SDD B2B rulebook version 1.0.</p> <p>The PSEMWG is well aware that the 2019 ISO version does not foresee a</p>	<p>Supports the PSEMWG Change Proposal. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. The ideal implementation approach is to firstly submit a change request to ISO 20022 to foresee a dedicated message element for this information. However, this will take time for ISO 20022 to assess and hopefully accept such change request. Moreover, the SEPA payment scheme rulebooks would also have to migrate to a newer ISO 20022 version. This can only be achieved by end 2027 at the earliest. To cover this transition period, a workaround for transporting the Commercial Trade Name must be found. The SEU MSG does not support the</p>



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		<p>dedicated field for the Commercial Trade Name. It does only see the Remittance Information attribute as the most suitable field for the time being. As a follow-up action, the PSEMWG would then approach ISO for asking a concrete solution under the ISO 20022 standard.</p>	<p>use of the Remittance Information (RI) message element as workaround. Payment end-users in some communities already extensively use the RI message element for other purposes. As an alternative, the SEU MSG suggestion to the EPC is to use the existing message elements ‘Name of the Payee Reference Party’ and ‘Name of the Payer Reference Party’ to transport the Commercial Trade Name information.</p>
13	Inclusion of Reference Party Address	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or does support it provided that the attribute is optional and does not imply any obligation for the PSPs to manage this information (e.g., for the Creditor PSP to acquire it from the payment service user for KYC purposes, to transport it further into the Inter-PSP space, and for the Debtor PSP to accept and to process it).</p> <p>These national communities of EPC payment scheme participants state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Not opening the Reference Party Address message elements for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification under ISO 20022. Payment end-users should have the possibility to insert such</p>



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
		<p>reporting). One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes. The PSEMWG reflected in depth on all comments received. Some of its members expressed concerns about the ‘yellow optional’ characteristic of the proposed attribute. This would mean that all PSPs would have to adapt their systems to support this extra attribute. Not to be included in the 2025 SDD B2B rulebook version 1.0.</p>	<p>information in the payment message.</p>
16	Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 SDD B2B rulebook version 1.0.</p>	<p>Supports the PSEMWG Change Proposal.</p>
17	Extension of Character Length for Name	<p>The majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the PSEMWG recommendation that this change request can be part of the scheme. However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request. These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in</p>	<p>Does not support the PSEMWG Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a</p>



Item	Change request title	EPC PSEMWG Change Proposal	SEU MSG position
		<p>the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting). One of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory changes stemming from the amended SEPA Regulation. This community states that there is no capacity left to implement this change request or any other change related to the upgrade of existing rulebook attributes or to the inclusion of new rulebook attributes. The PSEMWG reflected in depth on all comments received and noted the absence of a strong market pressure for extending the character length for the respective Name fields and a huge impact on the whole payment chain.</p> <p>Not to be included in the 2025 SDD B2B rulebook version 1.0.</p>	<p>globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>



7. SEU MSG position on 2024 OLO TF Change Proposals – OCT Inst Scheme Rulebook

Item	Change request title	EPC OLO TF Change Proposal	SEU MSG position
3	New Entry-Into-Force Time of the SCT Inst and OCT Inst Scheme Rulebooks as of November 2025	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request can be part of the scheme. For inclusion in the 2025 OCT Inst rulebook version 1.0.	Supports the OLO TF Change Proposal.
6	Introduction of Hybrid Address of the Payment End-User	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request can be part of the scheme. For inclusion in the 2025 OCT Inst rulebook version 1.0.	Supports the OLO TF Change Proposal.
9	Introduce pacs.009 to Replace pacs.008 for Inter-PSP Transactions	The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request cannot be part of the scheme. Not to be included in the 2025 OCT Inst rulebook version 1.0.	Supports the OLO TF Change Proposal.
11	Extension of Character Length for Name	A majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request can be part of the scheme. However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request. These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related	Does not support the OLO TF Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for



Item	Change request title	EPC OLO TF Change Proposal	SEU MSG position
		<p>services (e.g., account statements, payment reporting). The OLO TF reflected in depth on all comments received. It also noted that the change proposal from the EPC body in charge of the daily management of the four EPC SEPA payment schemes (i.e. the Payment Scheme Evolution and Maintenance Working Group (PSEMWG)), proposes not to include this change request in all four SEPA payment scheme rulebooks. Ideally, the OCT Inst scheme is to be aligned as much as possible with the CBPR+ specifications which allow 140 characters. On the other hand, if the SEPA payment scheme rulebooks would remain at 70 characters whereas the OCT Inst scheme would support 140 characters, such deviation could potentially dent the appetite of SCT Inst scheme participants interested in adhering to the OCT Inst scheme given the various system changes these PSPs would have to make for supporting OCT Inst transactions. As the OCT Inst scheme is a recently launched and optional scheme and has been designed to cover only the Euro Leg of international (instant) credit transfers, the OLO TF wants to avoid setting extra implementation challenges for SCT Inst scheme participants interested in becoming an OCT Inst scheme participant as well. The OCT Inst scheme makes it possible for PSPs in the Euro Leg to maximise synergies with the existing SEPA payment ‘rails’ - including procedures, features and standards - that are reflected in arrangements which PSPs are already familiar with such as the SCT Inst scheme and the existing SEPA payment infrastructures. It would make little sense to extend the character limit length only for OCT Inst transactions when these SEPA payment ‘rails’ only support up to 70 characters. Not to be included in the 2025 OCT Inst rulebook version 1.0.</p>	<p>the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>



Item	Change request title	EPC OLO TF Change Proposal	SEU MSG position
14	Several Occurrences of 'Service Level' field for Incoming and Outgoing OCT Inst Transactions	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request can be part of the scheme.</p> <p>To be included in the 2025 OCT Inst rulebook version 1.0.</p>	Supports the OLO TF Change Proposal.
16	Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 OCT Inst rulebook version 1.0.</p>	Supports the OLO TF Change Proposal.
17	Extension of Character Length for Name	<p>A majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting).</p> <p>The OLO TF reflected in depth on all comments received. It also noted that the change proposal from the EPC body in charge of the daily management of the four EPC SEPA payment schemes (i.e. the Payment Scheme Evolution and Maintenance Working Group (PSEMWG)), proposes not to include this change request in all four SEPA payment</p>	<p>Does not support the OLO TF Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus</p>



Item	Change request title	EPC OLO TF Change Proposal	SEU MSG position
		<p>scheme rulebooks.</p> <p>Ideally, the OCT Inst scheme is to be aligned as much as possible with the CBPR+ specifications which allow 140 characters.</p> <p>On the other hand, if the SEPA payment scheme rulebooks would remain at 70 characters only whereas the OCT Inst scheme would support 140 characters, such deviation could potentially dent the appetite of SCT Inst scheme participants interested to adhere to the OCT Inst scheme given the various system changes these PSPs will have to make for supporting OCT Inst transactions.</p> <p>As the OCT Inst scheme is a recently launched and optional scheme and has been designed to cover only the Euro Leg of international (instant) credit transfers, the OLO TF wants to avoid setting extra implementation challenges for SCT Inst scheme participants interested in becoming an OCT Inst scheme participant as well.</p> <p>The OCT Inst scheme makes it possible for PSPs in the Euro Leg to maximise synergies with the existing SEPA payment ‘rails’ - including procedures, features and standards - that are reflected in arrangements which PSPs are already familiar with such as the SCT Inst scheme and the existing SEPA payment infrastructures. It would make little sense to extend the character limit length only for OCT Inst transactions when these SEPA payment ‘rails’ only support up to 70 characters.</p> <p>Not to be included in the 2025 OCT Inst rulebook version 1.0.</p>	<p>(CBPR+) specifications-based payments.</p>



Item	Change request title	EPC OLO TF Change Proposal	SEU MSG position
21	Extension of Character Length for Name	<p>A majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request can be part of the scheme.</p> <p>However, there is a minority of national communities of EPC payment scheme participants representing a considerable volume of SEPA transactions that either does not support this change request, or could not come to a position about this change request.</p> <p>These national communities of EPC payment scheme participants see no market demand, added value or benefit for the PSPs or for payment service users from this change request. They also state that this change request will have a significant impact on the whole payment chain (e.g., in the payment initiation channels, in the inter-PSP space) and in the related services (e.g., account statements, payment reporting).</p> <p>The OLO TF reflected in depth on all comments received. It also noted that the change proposal from the EPC body in charge of the daily management of the four EPC SEPA payment schemes (i.e. the Payment Scheme Evolution and Maintenance Working Group (PSEMWG)), proposes not to include this change request in all four SEPA payment scheme rulebooks.</p> <p>Ideally, the OCT Inst scheme is to be aligned as much as possible with the CBPR+ specifications which allow 140 characters.</p> <p>On the other hand, if the SEPA payment scheme rulebooks would remain at 70 characters only whereas the OCT Inst scheme would support 140 characters, such deviation could potentially dent the appetite of SCT Inst scheme participants interested to adhere to the OCT Inst scheme given the various system changes these PSPs would have to make for supporting OCT Inst transactions.</p> <p>As the OCT Inst scheme is a recently launched and optional scheme and has been designed to cover only the Euro Leg of international (instant)</p>	<p>Does not support the OLO TF Change Proposal. The SEU MSG supports the initial change request. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users. Maintaining the 70 characters limit for euro retail credit transfers and direct debits in Europe is a deviation from a globally accepted specification of 140 characters for the Name message elements. This creates confusion for payment end-users who execute both euro retail account-to-account payments and Cross-border Payments and Reporting Plus (CBPR+) specifications-based payments.</p>



Item	Change request title	EPC OLO TF Change Proposal	SEU MSG position
		<p>credit transfers, the OLO TF wants to avoid setting extra implementation challenges for SCT Inst scheme participants interested in becoming an OCT Inst scheme participant as well.</p> <p>The OCT Inst scheme makes it possible for PSPs in the Euro Leg to maximise synergies with the existing SEPA payment ‘rails’ - including procedures, features and standards - that are reflected in arrangements which PSPs are already familiar with such as the SCT Inst scheme and the existing SEPA payment infrastructures. It would make little sense to extend the character limit length only for OCT Inst transactions when these SEPA payment ‘rails’ only support up to 70 characters.</p> <p>Not to be included in the 2025 OCT Inst rulebook version 1.0.</p>	
22	Amend IGs to Have Two Different Message Sets	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 OCT Inst rulebook version 1.0.</p>	Supports the OLO TF Change Proposal.
23	Introduction of Hybrid Address to Align with CPMI Requirements	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request can be part of the scheme.</p> <p>To be included in the 2025 OCT Inst rulebook version 1.0.</p>	Supports the OLO TF Change Proposal.
24	Introduction of Common Time Convention for all Message Elements	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation <i>including the modifications as described in that OLO TF recommendation</i>, that this change request can be part of the scheme.</p> <p>For inclusion with the modifications as described in the OLO TF recommendation for the public consultation, in the 2025 OCT Inst</p>	Supports the OLO TF Change Proposal.



Item	Change request title	EPC OLO TF Change Proposal	SEU MSG position
		<p>rulebook version 1.0.</p> <p>Distinction to be made between the incoming and outgoing OCT Inst transaction flows:</p> <p><u>INCOMING:</u></p> <p>For the element ‘Acceptance Date Time’ (AT-T056 Euro Leg Time Stamp of the OCT Inst), the proposed usage rule is that the Time Stamp must be unambiguous and at least include milliseconds and allows two date time formats (i.e. UTC and UTC offset).</p> <p>For the elements ‘Creation Date Time’ and ‘Settlement Time Indication/Debit Date Time’ (AT-T057 Non-Euro Leg Time Stamp of the OCT Inst), the proposed usage rule “This is the date time format as received from the non-Euro leg” is added.</p> <p><u>OUTGOING:</u></p> <p>For the elements ‘Creation Date Time’, ‘Interbank Settlement Date’ (AT-T051 The Settlement Date of the Euro Leg of the OCT Inst) and ‘Acceptance Date Time’ (AT-T056 Euro Leg Time Stamp of the OCT Inst), the proposed usage rule is that the Time Stamp must be unambiguous and at least include milliseconds and allows two date time formats (i.e. UTC and UTC offset).</p>	
25	Change of Currency Check Rules at Application Level	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 OCT Inst rulebook version 1.0.</p>	Supports the OLO TF Change Proposal.
28	Integrate OCT Inst Scheme into SCT Inst Scheme	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2025 OCT Inst rulebook version 1.0.</p>	Supports the OLO TF Change Proposal.



Item	Change request title	EPC OLO TF Change Proposal	SEU MSG position
29	Precisions on Recalls and Status Requests on Recalls	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2025 OCT Inst rulebook version 1.0.</p>	Supports the OLO TF Change Proposal.
30	Changes to the OCT Inst Inquiry Procedure	<p>The vast majority of EPC payment scheme participants (via national communities or via individual comments) and other contributors to the 2024 public consultation supported the OLO TF recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2025 OCT Inst rulebook version 1.0.</p>	Supports the OLO TF Change Proposal.