Position of the Scheme Technical Player Multi-Stakeholder Group (STP MSG) on the 2024 PSEMWG and OLO TF Change Proposals for the EPC Payment Scheme Rulebooks

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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.

EPC180-24 STP MSG position on 2024 PSEMWG and OLO TF Change Proposals for the EPC payment scheme rulebooks

This STP 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. STP MSG position on 2024 PSEMWG Change Proposals – SCT Scheme Rulebook

Item	Change request title	EPC PSEMWG Change Proposal	STP 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	STP MSG position
11	Extension of Character	The majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Length for Name	communities or via individual comments) and other contributors to the	Proposal <u>for this cycle</u> . Although
		2024 public consultation supported the PSEMWG recommendation that	the STP MSG prefers having this
		this change request can be part of the scheme.	change request introduced as soon
		However, there is a minority of national communities of EPC payment	as possible, it understands the
		scheme participants representing a considerable volume of SEPA	concerns and the challenges
		transactions that either does not support this change request, or could	expressed by some PSP
		not come to a position about this change request.	communities representing a
		These national communities of EPC payment scheme participants see no	considerable volume of SEPA
		market demand, added value or benefit for the PSPs or for payment	transactions, to implement this by
		service users from this change request. They also state that this change	the earlier than initially foreseen
		request will have a significant impact on the whole payment chain (e.g., in	entry-into-force date of the 2025
		the payment initiation channels, in the inter-PSP space) and in the related	EPC payment scheme rulebooks.
		services (e.g., account statements, payment reporting).	Nevertheless, the STP MSG
		One of these national communities further points out that the scheme	strongly recommends the EPC to
		participants concerned must dedicate their resources to all regulatory	re-present this change request for
		changes stemming from the amended SEPA Regulation. This community	the 2026 EPC payment scheme
		states that there is no capacity left to implement this change request or	rulebook change management
		any other change related to the upgrade of existing rulebook attributes or	cycle for all <u>five</u> EPC payment
		to the inclusion of new rulebook attributes.	scheme rulebooks. The STP MSG
		The PSEMWG reflected in depth on all comments received and noted the	points out that the Committee on
		absence of a strong market pressure for extending the character length	Payments and Market
		for the respective Name fields and a huge impact on the whole payment	Infrastructures (CPMI) of the Bank
		chain.	of International Settlements (BIS)
		Not to be included in the 2025 SCT rulebook version 1.0.	strives to extend the number of
			characters for the Name fields
			from 70 to 140 by the end of 2027.
			The EPC payment schemes should
			not deviate from such globally



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
			adopted message element
			specification.
12	Inclusion of Commercial	A majority of EPC payment scheme participants (via national communities	Supports the PSEMWG Change
	Trade Name	or via individual comments) and other contributors to the 2024 public	Proposal. The STP MSG considers
		consultation supported the PSEMWG recommendation that this change	that the possibility of transporting
		request can be part of the scheme.	the Commercial Trade Names adds
		However, there is a minority of national communities of EPC payment	value to all four SEPA payment
		scheme participants representing a considerable volume of SEPA	scheme rulebooks. It increases the
		transactions that either does not support this change request, or could	transparency for retail payment
		not come to a position about this change request.	end-users. The STP MSG
		These national communities remark that this change request does not	understands that the 2019 version
		indicate how it will be implemented, or see insufficient business value in	of the ISO 20022 standard does not
		this change request for payment service users.	foresee a dedicated message
		One community also expects a large impact on various initiation and	element for this information. A
		reporting channels, transaction processing systems and databases used	change request to ISO 20022 to
		by the EPC payment scheme participants. As PSPs have to allocate their	foresee a dedicated message
		resources for all regulatory changes stemming from the amended SEPA	element can be valuable but this
		Regulation, there is no capacity left to implement this change nor any	should be driven by the payment
		other change related to the upgrade of existing or the inclusion of new	use cases under the SCT schemes
		attributes.	and the SDD schemes. Such
		The PSEMWG points out that there are legislative initiatives (e.g.,	dedicated field can be useful for
		amended SEPA Regulation, the upcoming Payment Services Regulation)	SDD collections but possibly not for
		making formal references to Commercial Trade Names.	SCT (Inst) transactions (unless
		To be included in the 2025 SCT rulebook version 1.0.	potentially in combination with
		The PSEMWG is well aware that the 2019 ISO version does not foresee a	Request-To-Pay). The STP MSG
		dedicated field for the Commercial Trade Name. It does only see the	considered a number of existing
		Remittance Information attribute as the most suitable field for the time	message elements that could be a
		being. As a follow-up action, the PSEMWG would then approach ISO for	workaround for the transition
		asking a concrete solution under the ISO 20022 standard.	period up to the migration of the



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
			SEPA payment scheme rulebooks to a newer ISO 20022 version. The STP MSG could not agree on a specific message element to be such workaround.
13	Inclusion of Reference Party Address	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. The PSEMWG reflected in depth on all comments received. Some of its members expressed concerns about the 'yellow optional' characteristic of	Supports the PSEMWG Change Proposal for this cycle . It understands the concerns and the challenges expressed by some PSP communities representing a considerable volume of SEPA transactions, to implement this by the earlier than initially foreseen entry-into-force date of the 2025 SEPA payment scheme rulebooks. Nevertheless, the STP MSG strongly recommends the EPC to re-present this change request for the 2026 EPC payment scheme rulebook change management cycle for all four SEPA payment scheme rulebooks. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users.



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		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 SCT rulebook version 1.0.	
15	Optional use of Unique End-	The vast majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	to-end Transaction Reference	communities or via individual comments) and other contributors to the	Proposal.
	(UETR)	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.	
16	Hybrid Address Mandatory in	The vast majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Inter-PSP Space and PSPs Are	communities or via individual comments) and other contributors to the	Proposal.
	Free to Set only Structured	2024 public consultation supported the PSEMWG recommendation that	
	Address in the Customer-to-	this change request cannot be part of the scheme.	
	PSP Space	Not to be included in the 2025 SCT rulebook version 1.0.	
17	Extension of Character	The majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Length for Name	communities or via individual comments) and other contributors to the	Proposal <u>for this cycle</u> . Although
		2024 public consultation supported the PSEMWG recommendation that	the STP MSG prefers having this
		this change request can be part of the scheme.	change request introduced as soon
		However, there is a minority of national communities of EPC payment	as possible, it understands the
		scheme participants representing a considerable volume of SEPA	concerns and the challenges
		transactions that either does not support this change request, or could	expressed by some PSP
		not come to a position about this change request.	communities representing a
		These national communities of EPC payment scheme participants see no	considerable volume of SEPA
		market demand, added value or benefit for the PSPs or for payment	transactions, to implement this by
		service users from this change request. They also state that this change	the earlier than initially foreseen
		request will have a significant impact on the whole payment chain (e.g., in	entry-into-force date of the 2025
		the payment initiation channels, in the inter-PSP space) and in the related	EPC payment scheme rulebooks.
		services (e.g., account statements, payment reporting).	Nevertheless, the STP MSG
		One of these national communities further points out that the scheme	strongly recommends the EPC to
		participants concerned must dedicate their resources to all regulatory	re-present this change request for



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		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 SCT rulebook version 1.0.	the 2026 EPC payment scheme rulebook change management cycle for all <u>five</u> EPC payment scheme rulebooks. The STP MSG points out that the Committee on Payments and Market Infrastructures (CPMI) of the Bank of International Settlements (BIS) strives to extend the number of characters for the Name fields from 70 to 140 by the end of 2027. The EPC payment schemes should not deviate from such globally adopted message element
19	Partial Transfer Back of Funds in case of Reason 'Fraud'	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.	specification. Supports the PSEMWG Change Proposal.
20	Extra Reason Code 'Fraud' for Request For Recall by the Originator (RFRO)	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.
21	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.	Supports the PSEMWG Change Proposal <u>for this cycle</u> . Although the STP MSG prefers having this change request introduced as soon



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		However, there is a minority of national communities of EPC payment	as possible, it understands the
		scheme participants representing a considerable volume of SEPA	concerns and the challenges
		transactions that either does not support this change request, or could	expressed by some PSP
		not come to a position about this change request.	communities representing a
		These national communities of EPC payment scheme participants see no	considerable volume of SEPA
		market demand, added value or benefit for the PSPs or for payment	transactions, to implement this by
		service users from this change request. They also state that this change	the earlier than initially foreseen
		request will have a significant impact on the whole payment chain (e.g., in	entry-into-force date of the 2025
		the payment initiation channels, in the inter-PSP space) and in the related	EPC payment scheme rulebooks.
		services (e.g., account statements, payment reporting).	Nevertheless, the STP MSG
		One of these national communities further points out that the scheme	strongly recommends the EPC to
		participants concerned must dedicate their resources to all regulatory	re-present this change request for
		changes stemming from the amended SEPA Regulation. This community	the 2026 EPC payment scheme
		states that there is no capacity left to implement this change request or	rulebook change management
		any other change related to the upgrade of existing rulebook attributes or	cycle for all <u>five</u> EPC payment
		to the inclusion of new rulebook attributes.	scheme rulebooks. The STP MSG
		The PSEMWG reflected in depth on all comments received and noted the	points out that the Committee on
		absence of a strong market pressure for extending the character length	Payments and Market
		for the respective Name fields and a huge impact on the whole payment	Infrastructures (CPMI) of the Bank
		chain.	of International Settlements (BIS)
		Not to be included in the 2025 SCT rulebook version 1.0.	strives to extend the number of
			characters for the Name fields
			from 70 to 140 by the end of 2027.
			The EPC payment schemes should
			not deviate from such globally
			adopted message element
			specification.



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
29	Precisions on Recalls and	The vast majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Status Requests on Recalls	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.	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 rulebook version 1.0.	Supports the PSEMWG Change Proposal.



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

Item	Change request title	EPC PSEMWG Change Proposal	STP 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 milli seconds) 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.



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		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.	
9	Introduce pacs.009 to	The vast majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Replace pacs.008 for Inter-	communities or via individual comments) and other contributors to the	Proposal.
	PSP Transactions	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.	
10	Possibility for Beneficiary to	The vast majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	return a SCT (Inst)	communities or via individual comments) and other contributors to the	Proposal.
	Transaction after the Amount	2024 public consultation supported the PSEMWG recommendation that	
	is Credited	this change request cannot be part of the scheme.	
		Not to be included in the 2025 SCT Inst rulebook version 1.0.	
11	Extension of Character	The majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Length for Name	communities or via individual comments) and other contributors to the	Proposal <u>for this cycle</u> . Although
		2024 public consultation supported the PSEMWG recommendation that	the STP MSG prefers having this
		this change request can be part of the scheme.	change request introduced as soon
		However, there is a minority of national communities of EPC payment	as possible, it understands the
		scheme participants representing a considerable volume of SEPA	concerns and the challenges
		transactions that either does not support this change request, or could	expressed by some PSP
		not come to a position about this change request.	communities representing a
		These national communities of EPC payment scheme participants see no	considerable volume of SEPA
		market demand, added value or benefit for the PSPs or for payment	transactions, to implement this by
		service users from this change request. They also state that this change	the earlier than initially foreseen
		request will have a significant impact on the whole payment chain (e.g., in	entry-into-force date of the 2025
		the payment initiation channels, in the inter-PSP space) and in the related	EPC payment scheme rulebooks.
		services (e.g., account statements, payment reporting).	Nevertheless, the STP MSG
		One of these national communities further points out that the scheme	strongly recommends the EPC to



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		participants concerned must dedicate their resources to all regulatory	re-present this change request for
		changes stemming from the amended SEPA Regulation. This community	the 2026 EPC payment scheme
		states that there is no capacity left to implement this change request or	rulebook change management
		any other change related to the upgrade of existing rulebook attributes or	cycle for all <u>five</u> EPC payment
		to the inclusion of new rulebook attributes.	scheme rulebooks. The STP MSG
		The PSEMWG reflected in depth on all comments received and noted the	points out that the Committee on
		absence of a strong market pressure for extending the character length	Payments and Market
		for the respective Name fields and a huge impact on the whole payment	Infrastructures (CPMI) of the Bank
		chain.	of International Settlements (BIS)
		Not to be included in the 2025 SCT Inst rulebook version 1.0.	strives to extend the number of
			characters for the Name fields
			from 70 to 140 by the end of 2027.
			The EPC payment schemes should
			not deviate from such globally
			adopted message element
			specification.
12	Inclusion of Commercial	A majority of EPC payment scheme participants (via national communities	Supports the PSEMWG Change
	Trade Name	or via individual comments) and other contributors to the 2024 public	Proposal. The STP MSG considers
		consultation supported the PSEMWG recommendation that this change	that the possibility of transporting
		request can be part of the scheme.	the Commercial Trade Names adds
		However, there is a minority of national communities of EPC payment	value to all four SEPA payment
		scheme participants representing a considerable volume of SEPA	scheme rulebooks. It increases the
		transactions that either does not support this change request, or could	transparency for retail payment
		not come to a position about this change request.	end-users. The STP MSG
		These national communities remark that this change request does not	understands that the 2019 version
		indicate how it will be implemented, or see insufficient business value in	of the ISO 20022 standard does not
		this change request for payment service users.	foresee a dedicated message
		One community also expects a large impact on various initiation and	element for this information. A
		reporting channels, transaction processing systems and databases used	change request to ISO 20022 to
		by the EPC payment scheme participants. As PSPs have to allocate their	foresee a dedicated message



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		resources for all regulatory changes stemming from the amended SEPA	element can be valuable but this
		Regulation, there is no capacity left to implement this change nor any	should be driven by the payment
		other change related to the upgrade of existing or the inclusion of new	use cases under the SCT schemes
		attributes.	and the SDD schemes. Such
		The PSEMWG points out that there are legislative initiatives (e.g.,	dedicated field can be useful for
		amended SEPA Regulation, the upcoming Payment Services Regulation)	SDD collections but possibly not for
		making formal references to Commercial Trade Names.	SCT (Inst) transactions (unless
		To be included in the 2025 SCT Inst rulebook version 1.0.	potentially in combination with
			Request-To-Pay). The STP MSG
		The PSEMWG is well aware that the 2019 ISO version does not foresee a	considered a number of existing
		dedicated field for the Commercial Trade Name. It does only see the	message elements that could be a
		Remittance Information attribute as the most suitable field for the time	workaround for the transition
		being. As a follow-up action, the PSEMWG would then approach ISO for	period up to the migration of the
		asking a concrete solution under the ISO 20022 standard.	SEPA payment scheme rulebooks
			to a newer ISO 20022 version. The
			STP MSG could not agree on a
			specific message element to be
			such workaround.
13	Inclusion of Reference Party	The majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Address	communities or via individual comments) and other contributors to the	Proposal <u>for this cycle</u> . It
		2024 public consultation supported the PSEMWG recommendation that	understands the concerns and the
		this change request can be part of the scheme.	challenges expressed by some PSP
		However, there is a minority of national communities of EPC payment	communities representing a
		scheme participants representing a considerable volume of SEPA	considerable volume of SEPA
		transactions that either does not support this change request, or does	transactions, to implement this by
		support it provided that the attribute is optional and does not imply any	the earlier than initially foreseen
		obligation for the PSPs to manage this information (e.g., for the Originator	entry-into-force date of the 2025
		PSP to acquire it from the payment service user for KYC purposes, to	SEPA payment scheme rulebooks.
		transport it further into the Inter-PSP space, and for the Beneficiary PSP	Nevertheless, the STP MSG
		to accept and to process it).	strongly recommends the EPC to



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		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. 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.	re-present this change request for the 2026 EPC payment scheme rulebook change management cycle for all <u>four</u> SEPA payment scheme rulebooks. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users.
15	Optional use of Unique End- to-end Transaction Reference (UETR)	Not to be included in the 2025 SCT Inst rulebook version 1.0. 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.
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 Inst rulebook version 1.0.	Supports the PSEMWG Change Proposal.



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
17	Extension of Character	The majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Length for Name	communities or via individual comments) and other contributors to the	Proposal <u>for this cycle</u> . Although
		2024 public consultation supported the PSEMWG recommendation that	the STP MSG prefers having this
		this change request can be part of the scheme.	change request introduced as soon
		However, there is a minority of national communities of EPC payment	as possible, it understands the
		scheme participants representing a considerable volume of SEPA	concerns and the challenges
		transactions that either does not support this change request, or could	expressed by some PSP
		not come to a position about this change request.	communities representing a
		These national communities of EPC payment scheme participants see no	considerable volume of SEPA
		market demand, added value or benefit for the PSPs or for payment	transactions, to implement this by
		service users from this change request. They also state that this change	the earlier than initially foreseen
		request will have a significant impact on the whole payment chain (e.g., in	entry-into-force date of the 2025
		the payment initiation channels, in the inter-PSP space) and in the related	EPC payment scheme rulebooks.
		services (e.g., account statements, payment reporting).	Nevertheless, the STP MSG
		One of these national communities further points out that the scheme	strongly recommends the EPC to
		participants concerned must dedicate their resources to all regulatory	re-present this change request for
		changes stemming from the amended SEPA Regulation. This community	the 2026 EPC payment scheme
		states that there is no capacity left to implement this change request or	rulebook change management
		any other change related to the upgrade of existing rulebook attributes or	cycle for all <u>five</u> EPC payment
		to the inclusion of new rulebook attributes.	scheme rulebooks. The STP MSG
		The PSEMWG reflected in depth on all comments received and noted the	points out that the Committee on
		absence of a strong market pressure for extending the character length	Payments and Market
		for the respective Name fields and a huge impact on the whole payment	Infrastructures (CPMI) of the Bank
		chain.	of International Settlements (BIS)
		Not to be included in the 2025 SCT Inst rulebook version 1.0.	strives to extend the number of
			characters for the Name fields
			from 70 to 140 by the end of 2027.
			The EPC payment schemes should
			not deviate from such globally



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
			adopted message element specification.
18	Reduction of target maximum execution time and time-out deadline	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. 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.	Supports the PSEMWG Change Proposal.
19	Partial Transfer Back of Funds in case of Reason 'Fraud'	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.
20	Extra Reason Code 'Fraud' for Request For Recall by the Originator (RFRO)	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.
21	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	Supports the PSEMWG Change Proposal <u>for this cycle</u> . Although the STP MSG prefers having this change request introduced as soon as possible, it understands the concerns and the challenges expressed by some PSP



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).Cone of these national communities further points out that the scheme participants concerned must dedicate their resources to all regulatory the 2026 reuest states that there is no capacity left to implement this change request orstates that there is no capacity left to implement this change request or	
market demand, added value or benefit for the PSPs or for paymenttransactionservice users from this change request. They also state that this changethe earlierequest will have a significant impact on the whole payment chain (e.g., inentry-intothe payment initiation channels, in the inter-PSP space) and in the relatedEPC paymentservices (e.g., account statements, payment reporting).NevertheOne of these national communities further points out that the schemestrongly re-presentparticipants concerned must dedicate their resources to all regulatoryre-presentthe 2026states that there is no capacity left to implement this change request orrulebook	ties representing a
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).the earlie entry-inter EPC payment Neverther strongly reparticipants concerned must dedicate their resources to all regulatory the 2026 states that there is no capacity left to implement this change request orthe earlie entry-inter entry-inter the amended SEPA Regulation. This community the 2026 rulebook	able volume of SEPA
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). Neverthe 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 rulebook	ons, to implement this by
the payment initiation channels, in the inter-PSP space) and in the relatedEPC paymentservices (e.g., account statements, payment reporting).NevertheOne of these national communities further points out that the schemestrongly rparticipants concerned must dedicate their resources to all regulatoryre-presentchanges stemming from the amended SEPA Regulation. This communitythe 2026states that there is no capacity left to implement this change request orrulebook	r than initially foreseen
services (e.g., account statements, payment reporting).NevertheOne of these national communities further points out that the schemestrongly rparticipants concerned must dedicate their resources to all regulatoryre-presentchanges stemming from the amended SEPA Regulation. This communitythe 2026states that there is no capacity left to implement this change request orrulebook	p-force date of the 2025
One of these national communities further points out that the scheme strongly represent participants concerned must dedicate their resources to all regulatory re-present changes stemming from the amended SEPA Regulation. This community the 2026 states that there is no capacity left to implement this change request or rulebook	nent scheme rulebooks.
participants concerned must dedicate their resources to all regulatoryre-presentchanges stemming from the amended SEPA Regulation. This communitythe 2026states that there is no capacity left to implement this change request orrulebook	less, the STP MSG
changes stemming from the amended SEPA Regulation. This communitythe 2026states that there is no capacity left to implement this change request orrulebook	ecommends the EPC to
states that there is no capacity left to implement this change request or rulebook	it this change request for
	EPC payment scheme
any other change related to the upgrade of existing rulebook attributes or cycle for a	change management
	all <u>five</u> EPC payment
to the inclusion of new rulebook attributes. scheme ru	ulebooks. The STP MSG
	t that the Committee on
absence of a strong market pressure for extending the character length Payments	s and Market
	ctures (CPMI) of the Bank
chain. of Interna	ational Settlements (BIS)
	extend the number of
character	s for the Name fields
	o 140 by the end of 2027.
	payment schemes should
	te from such globally
	message element
specificat	
	the PSEMWG Change
Reversal in the Inter-PSPcommunities or via individual comments) and other contributors to theProposal.	
Space 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.	



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
27	Call for More Suitable Date	The vast majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	and Time for Rulebook	communities or via individual comments) and other contributors to the	Proposal.
	Version Change-Over (with	2024 public consultation supported the PSEMWG recommendation that	
	no downtime)	this change request can be part of the scheme.	
		For inclusion in the 2025 SCT Inst rulebook version 1.0.	
29	Precisions on Recalls and	The vast majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Status Requests on Recalls	communities or via individual comments) and other contributors to the	Proposal.
		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.	
31	New XML Message Type to	The vast majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Exchange Extra Info between	communities or via individual comments) and other contributors to the	Proposal.
	PSPs	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.	
32	Optional use of Unique End-	The vast majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	to-end Transaction Reference	communities or via individual comments) and other contributors to the	Proposal.
	(UETR)	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.	



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

Item	Change request title	EPC PSEMWG Change Proposal	STP 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	Supports the PSEMWG Change Proposal for this cycle . Although the STP MSG prefers having this change request introduced as soon as possible, it understands the concerns and the challenges expressed by some PSP communities representing a considerable volume of SEPA transactions, to implement this by the earlier than initially foreseen entry-into-force date of the 2025 EPC payment scheme rulebooks. Nevertheless, the STP MSG strongly recommends the EPC to re-present this change request for the 2026 EPC payment scheme rulebook change management



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		any other change related to the upgrade of existing rulebook attributes or	cycle for all <u>five</u> EPC payment
		to the inclusion of new rulebook attributes.	scheme rulebooks. The STP MSG
		The PSEMWG reflected in depth on all comments received and noted the	points out that the Committee on
		absence of a strong market pressure for extending the character length	Payments and Market
		for the respective Name fields and a huge impact on the whole payment	Infrastructures (CPMI) of the Bank
		chain.	of International Settlements (BIS)
		Not to be included in the 2025 SDD Core rulebook version 1.0.	strives to extend the number of
			characters for the Name fields
			from 70 to 140 by the end of
			2027. The EPC payment schemes
			should not deviate from such
			globally adopted message
			element specification.
12	Inclusion of Commercial	A majority of EPC payment scheme participants (via national communities	Supports the PSEMWG Change
	Trade Name	or via individual comments) and other contributors to the 2024 public	Proposal. The STP MSG considers
		consultation supported the PSEMWG recommendation that this change	that the possibility of transporting
		request can be part of the scheme.	the Commercial Trade Names
		However, there is a minority of national communities of EPC payment	adds value to all four SEPA
		scheme participants representing a considerable volume of SEPA	payment scheme rulebooks. It
		transactions that either does not support this change request, or could	increases the transparency for
		not come to a position about this change request.	retail payment end-users. The STP
		These national communities remark that this change request does not	MSG understands that the 2019
		indicate how it will be implemented, or see insufficient business value in	version of the ISO 20022 standard
		this change request for payment service users.	does not foresee a dedicated
		One community also expects a large impact on various initiation and	message element for this
		reporting channels, transaction processing systems and databases used	information. A change request to
		by the EPC payment scheme participants. As PSPs have to allocate their	ISO 20022 to foresee a dedicated
		resources for all regulatory changes stemming from the amended SEPA	message element can be valuable
		Regulation, there is no capacity left to implement this change nor any	but this should be driven by the
		other change related to the upgrade of existing or the inclusion of new	payment use cases under the SCT



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		attributes.	schemes and the SDD schemes.
		The PSEMWG points out that there are legislative initiatives (e.g.,	Such dedicated field can be useful
		amended SEPA Regulation, the upcoming Payment Services Regulation)	for SDD collections but possibly
		making formal references to Commercial Trade Names.	not for SCT (Inst) transactions
		For inclusion in the 2025 SDD Core rulebook version 1.0.	(unless potentially in combination
		The PSEMWG is well aware that the 2019 ISO version does not foresee a	with Request-To-Pay). The STP
		dedicated field for the Commercial Trade Name. It does only see the	MSG considered a number of
		Remittance Information attribute as the most suitable field for the time	existing message elements that
		being. As a follow-up action, the PSEMWG would then approach ISO for	could be a workaround for the
		asking a concrete solution under the ISO 20022 standard.	transition period up to the
			migration of the SEPA payment
			scheme rulebooks to a newer ISO
			20022 version. The STP MSG could
			not agree on a specific message
			element to be such workaround.
13	Inclusion of Reference Party	The majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Address	communities or via individual comments) and other contributors to the	Proposal <u>for this cycle</u> . It
		2024 public consultation supported the PSEMWG recommendation that	understands the concerns and the
		this change request can be part of the scheme.	challenges expressed by some PSP
		However, there is a minority of national communities of EPC payment	communities representing a
		scheme participants representing a considerable volume of SEPA	considerable volume of SEPA
		transactions that either does not support this change request, or does	transactions, to implement this by
		support it provided that the attribute is optional and does not imply any	the earlier than initially foreseen
		obligation for the PSPs to manage this information (e.g., for the Creditor	entry-into-force date of the 2025
		PSP to acquire it from the payment service user for KYC purposes, to	SEPA payment scheme rulebooks.
		transport it further into the Inter-PSP space, and for the Debtor PSP to	Nevertheless, the STP MSG
		accept and to process it).	strongly recommends the EPC to
		These national communities of EPC payment scheme participants state	re-present this change request for
		that this change request will have a significant impact on the whole	the 2026 EPC payment scheme
		payment chain (e.g., in the payment initiation channels, in the inter-PSP	rulebook change management



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		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. Some of its	cycle for all <u>four</u> SEPA payment scheme rulebooks. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users.
		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 Core rulebook version 1.0.	
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 SDD Core 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	Supports the PSEMWG Change Proposal <u>for this cycle</u> . Although the STP MSG prefers having this change request introduced as soon as possible, it understands the concerns and the challenges expressed by some PSP communities representing a considerable volume of SEPA transactions, to implement this by the earlier than initially foreseen



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		request will have a significant impact on the whole payment chain (e.g., in	entry-into-force date of the 2025
		the payment initiation channels, in the inter-PSP space) and in the related	EPC payment scheme rulebooks.
		services (e.g., account statements, payment reporting).	Nevertheless, the STP MSG
		One of these national communities further points out that the scheme	strongly recommends the EPC to
		participants concerned must dedicate their resources to all regulatory	re-present this change request for
		changes stemming from the amended SEPA Regulation. This community	the 2026 EPC payment scheme
		states that there is no capacity left to implement this change request or	rulebook change management
		any other change related to the upgrade of existing rulebook attributes or	cycle for all <u>five</u> EPC payment
		to the inclusion of new rulebook attributes.	scheme rulebooks. The STP MSG
		The PSEMWG reflected in depth on all comments received and noted the	points out that the Committee on
		absence of a strong market pressure for extending the character length	Payments and Market
		for the respective Name fields and a huge impact on the whole payment	Infrastructures (CPMI) of the Bank
		chain.	of International Settlements (BIS)
		Not to be included in the 2025 SDD Core rulebook version 1.0.	strives to extend the number of
			characters for the Name fields
			from 70 to 140 by the end of
			2027. The EPC payment schemes
			should not deviate from such
			globally adopted message
			element specification.



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

Item	Change request title	EPC PSEMWG Change Proposal	STP 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	Supports the PSEMWG Change Proposal for this cycle . Although the STP MSG prefers having this change request introduced as soon as possible, it understands the concerns and the challenges expressed by some PSP communities representing a considerable volume of SEPA transactions, to implement this by the earlier than initially foreseen entry-into-force date of the 2025 EPC payment scheme rulebooks. Nevertheless, the STP MSG strongly recommends the EPC to re-present this change request for the 2026 EPC payment scheme rulebook change management



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		any other change related to the upgrade of existing rulebook attributes or	cycle for all <u>five</u> EPC payment
		to the inclusion of new rulebook attributes.	scheme rulebooks. The STP MSG
		The PSEMWG reflected in depth on all comments received and noted the	points out that the Committee on
		absence of a strong market pressure for extending the character length	Payments and Market
		for the respective Name fields and a huge impact on the whole payment	Infrastructures (CPMI) of the Bank
		chain.	of International Settlements (BIS)
		Not to be included in the 2025 SDD B2B rulebook version 1.0.	strives to extend the number of
			characters for the Name fields
			from 70 to 140 by the end of
			2027. The EPC payment schemes
			should not deviate from such
			globally adopted message
			element specification.
12	Inclusion of Commercial	A majority of EPC payment scheme participants (via national communities	Supports the PSEMWG Change
	Trade Name	or via individual comments) and other contributors to the 2024 public	Proposal. The STP MSG considers
		consultation supported the PSEMWG recommendation that this change	that the possibility of transporting
		request can be part of the scheme.	the Commercial Trade Names
		However, there is a minority of national communities of EPC payment	adds value to all four SEPA
		scheme participants representing a considerable volume of SEPA	payment scheme rulebooks. It
		transactions that either does not support this change request, or could	increases the transparency for
		not come to a position about this change request.	retail payment end-users. The STP
		These national communities remark that this change request does not	MSG understands that the 2019
		indicate how it will be implemented, or see insufficient business value in	version of the ISO 20022 standard
		this change request for payment service users.	does not foresee a dedicated
		One community also expects a large impact on various initiation and	message element for this
		reporting channels, transaction processing systems and databases used	information. A change request to
		by the EPC payment scheme participants. As PSPs have to allocate their	ISO 20022 to foresee a dedicated
		resources for all regulatory changes stemming from the amended SEPA	message element can be valuable
		Regulation, there is no capacity left to implement this change nor any	but this should be driven by the
		other change related to the upgrade of existing or the inclusion of new	payment use cases under the SCT



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		attributes.	schemes and the SDD schemes.
		The PSEMWG points out that there are legislative initiatives (e.g.,	Such dedicated field can be useful
		amended SEPA Regulation, the upcoming Payment Services Regulation)	for SDD collections but possibly
		making formal references to Commercial Trade Names.	not for SCT (Inst) transactions
		To be included in the 2025 SDD B2B rulebook version 1.0.	(unless potentially in combination
		The PSEMWG is well aware that the 2019 ISO version does not foresee a	with Request-To-Pay). The STP
		dedicated field for the Commercial Trade Name. It does only see the	MSG considered a number of
		Remittance Information attribute as the most suitable field for the time	existing message elements that
		being. As a follow-up action, the PSEMWG would then approach ISO for	could be a workaround for the
		asking a concrete solution under the ISO 20022 standard.	transition period up to the
			migration of the SEPA payment
			scheme rulebooks to a newer ISO
			20022 version. The STP MSG could
			not agree on a specific message
			element to be such workaround.
13	Inclusion of Reference Party	The majority of EPC payment scheme participants (via national	Supports the PSEMWG Change
	Address	communities or via individual comments) and other contributors to the	Proposal <u>for this cycle</u> . It
		2024 public consultation supported the PSEMWG recommendation that	understands the concerns and the
		this change request can be part of the scheme.	challenges expressed by some PSP
		However, there is a minority of national communities of EPC payment	communities representing a
		scheme participants representing a considerable volume of SEPA	considerable volume of SEPA
		transactions that either does not support this change request, or does	transactions, to implement this by
		support it provided that the attribute is optional and does not imply any	the earlier than initially foreseen
		obligation for the PSPs to manage this information (e.g., for the Creditor	entry-into-force date of the 2025
		PSP to acquire it from the payment service user for KYC purposes, to	SEPA payment scheme rulebooks.
		transport it further into the Inter-PSP space, and for the Debtor PSP to	Nevertheless, the STP MSG
		accept and to process it).	strongly recommends the EPC to
		These national communities of EPC payment scheme participants state	re-present this change request for
		that this change request will have a significant impact on the whole	the 2026 EPC payment scheme
		payment chain (e.g., in the payment initiation channels, in the inter-PSP	rulebook change management



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
item		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. Some of its	cycle for all <u>four</u> SEPA payment scheme rulebooks. It answers the Euro Retail Payments Board (ERPB) recommendations issued in 2021 to increase the transparency for retail payment end-users.
		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.	
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 SDD B2B 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	Supports the PSEMWG Change Proposal <u>for this cycle</u> . Although the STP MSG prefers having this change request introduced as soon as possible, it understands the concerns and the challenges expressed by some PSP communities representing a considerable volume of SEPA transactions, to implement this by the earlier than initially foreseen



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		request will have a significant impact on the whole payment chain (e.g., in	entry-into-force date of the 2025
		the payment initiation channels, in the inter-PSP space) and in the related	EPC payment scheme rulebooks.
		services (e.g., account statements, payment reporting).	Nevertheless, the STP MSG
		One of these national communities further points out that the scheme	strongly recommends the EPC to
		participants concerned must dedicate their resources to all regulatory	re-present this change request for
		changes stemming from the amended SEPA Regulation. This community	the 2026 EPC payment scheme
		states that there is no capacity left to implement this change request or	rulebook change management
		any other change related to the upgrade of existing rulebook attributes or	cycle for all <u>five</u> EPC payment
		to the inclusion of new rulebook attributes.	scheme rulebooks. The STP MSG
		The PSEMWG reflected in depth on all comments received and noted the	points out that the Committee on
		absence of a strong market pressure for extending the character length	Payments and Market
		for the respective Name fields and a huge impact on the whole payment	Infrastructures (CPMI) of the Bank
		chain.	of International Settlements (BIS)
		Not to be included in the 2025 SDD B2B rulebook version 1.0.	strives to extend the number of
			characters for the Name fields
			from 70 to 140 by the end of
			2027. The EPC payment schemes
			should not deviate from such
			globally adopted message
			element specification.



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

Item	Change request title	EPC OLO TF Change Proposal	STP 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	Supports the OLO TF Change Proposal for this cycle . Although the STP MSG prefers having this change request introduced as soon as possible, it understands the concerns and the challenges expressed by some PSP communities representing a considerable volume of SEPA transactions, to implement this by the earlier than initially foreseen entry-into-force date of the 2025 EPC payment scheme rulebooks.



Item	Change request title	EPC OLO TF Change Proposal	STP MSG position
		services (e.g., account statements, payment reporting).	Nevertheless, the STP MSG
		The OLO TF reflected in depth on all comments received. It also noted	strongly recommends the EPC to
		that the change proposal from the EPC body in charge of the daily	re-present this change request for
		management of the four EPC SEPA payment schemes (i.e. the Payment	the 2026 EPC payment scheme
		Scheme Evolution and Maintenance Working Group (PSEMWG)),	rulebook change management
		proposes not to include this change request in all four SEPA payment	cycle for all <u>five</u> EPC payment
		scheme rulebooks.	scheme rulebooks. The STP MSG
		Ideally, the OCT Inst scheme is to be aligned as much as possible with the	points out that the Committee on
		CBPR+ specifications which allow 140 characters.	Payments and Market
		On the other hand, if the SEPA payment scheme rulebooks would remain	Infrastructures (CPMI) of the Bank
		at 70 characters whereas the OCT Inst scheme would support 140	of International Settlements (BIS)
		characters, such deviation could potentially dent the appetite of SCT Inst	strives to extend the number of
		scheme participants interested in adhering to the OCT Inst scheme given	characters for the Name fields
		the various system changes these PSPs would have to make for	from 70 to 140 by the end of 2027.
		supporting OCT Inst transactions.	The EPC payment schemes should
		As the OCT Inst scheme is a recently launched and optional scheme and	not deviate from such globally
		has been designed to cover only the Euro Leg of international (instant)	adopted message element
		credit transfers, the OLO TF wants to avoid setting extra implementation	specification.
		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.	



Item	Change request title	EPC OLO TF Change Proposal	STP MSG position
14	Several Occurrences of 'Service Level' field for Incoming and Outgoing OCT Inst 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 can be part of the scheme. To be included in the 2025 OCT Inst rulebook version 1.0.	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	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.
17	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 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	Supports the OLO TF Change Proposal for this cycle . Although the STP MSG prefers having this change request introduced as soon as possible, it understands the concerns and the challenges expressed by some PSP communities representing a considerable volume of SEPA transactions, to implement this by the earlier than initially foreseen entry-into-force date of the 2025 EPC payment scheme rulebooks. Nevertheless, the STP MSG strongly recommends the EPC to re-present this change request for the 2026 EPC payment scheme rulebook change management cycle for all five EPC payment



Item	Change request title	EPC OLO TF Change Proposal	STP MSG position
		scheme rulebooks.	scheme rulebooks. The STP MSG
		Ideally, the OCT Inst scheme is to be aligned as much as possible with the	points out that the Committee on
		CBPR+ specifications which allow 140 characters.	Payments and Market
		On the other hand, if the SEPA payment scheme rulebooks would remain	Infrastructures (CPMI) of the Bank
		at 70 characters only whereas the OCT Inst scheme would support 140	of International Settlements (BIS)
		characters, such deviation could potentially dent the appetite of SCT Inst	strives to extend the number of
		scheme participants interested to adhere to the OCT Inst scheme given	characters for the Name fields
		the various system changes these PSPs would have to make for	from 70 to 140 by the end of 2027.
		supporting OCT Inst transactions.	The EPC payment schemes should
		As the OCT Inst scheme is a recently launched and optional scheme and	not deviate from such globally
		has been designed to cover only the Euro Leg of international (instant)	adopted message element
		credit transfers, the OLO TF wants to avoid setting extra implementation	specification.
		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.	



Item	Change request title	EPC OLO TF Change Proposal	STP MSG position
21	Extension of Character	A majority of EPC payment scheme participants (via national communities	Supports the OLO TF Change
	Length for Name	or via individual comments) and other contributors to the 2024 public	Proposal <u>for this cycle</u> . Although
		consultation supported the OLO TF recommendation that this change	the STP MSG prefers having this
		request can be part of the scheme.	change request introduced as soon
		However, there is a minority of national communities of EPC payment	as possible, it understands the
		scheme participants representing a considerable volume of SEPA	concerns and the challenges
		transactions that either does not support this change request, or could	expressed by some PSP
		not come to a position about this change request.	communities representing a
		These national communities of EPC payment scheme participants see no	considerable volume of SEPA
		market demand, added value or benefit for the PSPs or for payment	transactions, to implement this by
		service users from this change request. They also state that this change	the earlier than initially foreseen
		request will have a significant impact on the whole payment chain (e.g., in	entry-into-force date of the 2025
		the payment initiation channels, in the inter-PSP space) and in the related	EPC payment scheme rulebooks.
		services (e.g., account statements, payment reporting).	Nevertheless, the STP MSG
		The OLO TF reflected in depth on all comments received. It also noted	strongly recommends the EPC to
		that the change proposal from the EPC body in charge of the daily	re-present this change request for
		management of the four EPC SEPA payment schemes (i.e. the Payment	the 2026 EPC payment scheme
		Scheme Evolution and Maintenance Working Group (PSEMWG)),	rulebook change management
		proposes not to include this change request in all four SEPA payment	cycle for all <u>five</u> EPC payment
		scheme rulebooks.	scheme rulebooks. The STP MSG
		Ideally, the OCT Inst scheme is to be aligned as much as possible with the	points out that the Committee on
		CBPR+ specifications which allow 140 characters.	Payments and Market
		On the other hand, if the SEPA payment scheme rulebooks would remain	Infrastructures (CPMI) of the Bank
		at 70 characters only whereas the OCT Inst scheme would support 140	of International Settlements (BIS)
		characters, such deviation could potentially dent the appetite of SCT Inst	strives to extend the number of
		scheme participants interested to adhere to the OCT Inst scheme given	characters for the Name fields
		the various system changes these PSPs would have to make for	from 70 to 140 by the end of 2027.
		supporting OCT Inst transactions.	The EPC payment schemes should
		As the OCT Inst scheme is a recently launched and optional scheme and	not deviate from such globally
		has been designed to cover only the Euro Leg of international (instant)	



Item	Change request title	EPC OLO TF Change Proposal	STP MSG position
		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.	adopted message element specification.
22	Amend IGs to Have Two Different Message Sets	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.
23	Introduction of Hybrid Address to Align with CPMI Requirements	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. To be included in the 2025 OCT Inst rulebook version 1.0.	Supports the OLO TF Change Proposal.
24	Introduction of Common Time Convention for all Message Elements	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. For inclusion with the modifications as described in the OLO TF recommendation recommendation of the public consultation, in the 2025 OCT Inst	Supports the OLO TF Change Proposal.



Change request title	EPC OLO TF Change Proposal	STP MSG position
	rulebook version 1.0.	
	Distinction to be made between the incoming and outgoing OCT Inst transaction flows: <u>INCOMING:</u> 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). 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. <u>OUTGOING:</u> 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).	
ge of Currency Check at Application Level	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.	Supports the OLO TF Change Proposal.
sat	Application Level	2024 public consultation supported the OLO TF recommendation that this



Item	Change request title	EPC OLO TF Change Proposal	STP MSG position
28	Integrate OCT Inst Scheme	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.	Supports the OLO TF Change
	into SCT Inst Scheme	Not to be included in the 2025 OCT Inst rulebook version 1.0.	Proposal.
29	Precisions on Recalls and	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.	Supports the OLO TF Change
	Status Requests on Recalls	For inclusion in the 2025 OCT Inst rulebook version 1.0.	Proposal.
30	Changes to the OCT Inst	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.	Supports the OLO TF Change
	Inquiry Procedure	For inclusion in the 2025 OCT Inst rulebook version 1.0.	Proposal.