

# 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

**EPC 180-24**  
**Version 1.0**  
**28 November 2024**

**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.

## **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. <b>For inclusion in the 2025 SCT rulebook version 1.0.</b>	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. <b>For inclusion in the 2025 SCT rulebook version 1.0.</b>	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. <b>Not to be included in the 2025 SCT rulebook version 1.0.</b>	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. <b>Not to be included in the 2025 SCT rulebook version 1.0.</b>	Supports the PSEMWG Change Proposal.



Item	Change request title	EPC PSEMWG Change Proposal	STP 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><b>Not to be included in the 2025 SCT rulebook version 1.0.</b></p>	<p>Supports the PSEMWG Change Proposal <b>for this cycle</b>. 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 <b>five</b> 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</p>



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			adopted message element specification.
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><b>To be included in the 2025 SCT rulebook version 1.0.</b></p> <p><b>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.</b></p>	Supports the PSEMWG Change Proposal. The STP MSG considers that the possibility of transporting the Commercial Trade Names adds value to all four SEPA payment scheme rulebooks. It increases the transparency for retail payment end-users. The STP MSG understands that the 2019 version of the ISO 20022 standard does not foresee a dedicated message element for this information. A change request to ISO 20022 to foresee a dedicated message element can be valuable but this should be driven by the payment use cases under the SCT schemes and the SDD schemes. Such dedicated field can be useful for SDD collections but possibly not for SCT (Inst) transactions (unless potentially in combination with Request-To-Pay). The STP MSG considered a number of existing message elements that could be a workaround for the transition period up to the migration of the



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			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	<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</p>	Supports the PSEMWG Change Proposal <b>for this cycle</b> . 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 <b>four</b> 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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		<p>the proposed attribute. This would mean that all PSPs would have to adapt their systems to support this extra attribute.</p> <p><b>Not to be included in the 2025 SCT rulebook version 1.0.</b></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><b>Not to be included in the 2025 SCT rulebook version 1.0.</b></p>	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	<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><b>Not to be included in the 2025 SCT rulebook version 1.0.</b></p>	Supports the PSEMWG Change Proposal.
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 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</p>	Supports the PSEMWG Change Proposal <b>for this cycle</b> . 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



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		<p>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><b>Not to be included in the 2025 SCT rulebook version 1.0.</b></p>	<p>the 2026 EPC payment scheme rulebook change management cycle for all <b>five</b> 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 specification.</p>
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><b>Not to be included in the 2025 SCT rulebook version 1.0.</b></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><b>Not to be included in the 2025 SCT rulebook version 1.0.</b></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>	Supports the PSEMWG Change Proposal <b>for this cycle</b> . Although the STP MSG prefers having this change request introduced as soon





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		<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><b>Not to be included in the 2025 SCT rulebook version 1.0.</b></p>	<p>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 <b>five</b> 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 specification.</p>



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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 PSEMWG recommendation that this change request can be part of the scheme.</p> <p><b>For inclusion in the 2025 SCT rulebook version 1.0.</b></p>	Supports the PSEMWG Change Proposal.
31	New XML Message Type to Exchange Extra Info between PSPs	<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><b>Not to be included in the 2025 SCT rulebook version 1.0.</b></p>	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. <b>For inclusion in the 2025 SCT Inst rulebook version 1.0.</b>	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. <b>For inclusion in the 2025 SCT Inst rulebook version 1.0.</b>	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. <b>For inclusion in the 2025 SCT Inst rulebook version 1.0.</b>	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 <b>only the first part</b> of this change request (i.e. the attribute AT-T056 being the timestamp must be unambiguous and at least include <b>milliseconds</b> ) can be part of the scheme. <b>Only the first part of this change request to be included in the 2025 SCT</b>	Supports the PSEMWG Change Proposal.



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		<p><b>Inst rulebook version 1.0.</b>  <b>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.</b></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.  <b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b></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.  <b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b></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>	Supports the PSEMWG Change Proposal <b>for this cycle</b> . 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



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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><b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b></p>	<p>re-present this change request for the 2026 EPC payment scheme rulebook change management cycle for all <b>five</b> 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 specification.</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</p>	<p>Supports the PSEMWG Change Proposal. The STP MSG considers that the possibility of transporting the Commercial Trade Names adds value to all four SEPA payment scheme rulebooks. It increases the transparency for retail payment end-users. The STP MSG understands that the 2019 version of the ISO 20022 standard does not foresee a dedicated message element for this information. A change request to ISO 20022 to foresee a dedicated message</p>



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		<p>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><b>To be included in the 2025 SCT Inst rulebook version 1.0.</b></p> <p><b>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.</b></p>	<p>element can be valuable but this should be driven by the payment use cases under the SCT schemes and the SDD schemes. Such dedicated field can be useful for SDD collections but possibly not for SCT (Inst) transactions (unless potentially in combination with Request-To-Pay). The STP MSG considered a number of existing message elements that could be a workaround for the 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.</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 <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).</p>	<p>Supports the PSEMWG Change Proposal <b>for this cycle</b>. 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</p>



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		<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 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><b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b></p>	<p>re-present this change request for the 2026 EPC payment scheme rulebook change management cycle for all <b>four</b> 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.</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><b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b></p>	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	<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><b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b></p>	Supports the PSEMWG Change Proposal.



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
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 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><b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b></p>	<p>Supports the PSEMWG Change Proposal <b>for this cycle</b>. 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 <b>five</b> 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</p>





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. <b>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.</b>	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. <b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b>	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. <b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b>	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 <b>for this cycle</b> . 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



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		<p>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><b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b></p>	<p>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 <b>five</b> 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 specification.</p>
26	Possibility of Payment Reversal in the Inter-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><b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b></p>	Supports the PSEMWG Change Proposal.



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
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. <b>For inclusion in the 2025 SCT Inst rulebook version 1.0.</b>	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. <b>For inclusion in the 2025 SCT Inst rulebook version 1.0.</b>	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. <b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b>	Supports the PSEMWG Change Proposal.
32	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. <b>Not to be included in the 2025 SCT Inst rulebook version 1.0.</b>	Supports the PSEMWG Change Proposal.



### 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. <b>For inclusion in the 2025 SDD Core rulebook version 1.0.</b>	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. <b>Not to be included in the 2025 SDD Core rulebook version 1.0.</b>	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 <b>for this cycle</b> . 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
		<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><b>Not to be included in the 2025 SDD Core rulebook version 1.0.</b></p>	<p>cycle for all <b>five</b> 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 specification.</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</p>	<p>Supports the PSEMWG Change Proposal. The STP MSG considers that the possibility of transporting the Commercial Trade Names adds value to all four SEPA payment scheme rulebooks. It increases the transparency for retail payment end-users. The STP MSG understands that the 2019 version of the ISO 20022 standard does not foresee a dedicated message element for this information. A change request to ISO 20022 to foresee a dedicated message element can be valuable but this should be driven by the payment use cases under the SCT</p>



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		<p>attributes. 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. <b>For inclusion in the 2025 SDD Core rulebook version 1.0.</b> <b>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.</b></p>	<p>schemes and the SDD schemes. Such dedicated field can be useful for SDD collections but possibly not for SCT (Inst) transactions (unless potentially in combination with Request-To-Pay). The STP MSG considered a number of existing message elements that could be a workaround for the 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.</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 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). 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</p>	<p>Supports the PSEMWG Change Proposal <b>for this cycle</b>. 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</p>



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		<p>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><b>Not to be included in the 2025 SDD Core rulebook version 1.0.</b></p>	<p>cycle for all <b>four</b> 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.</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><b>Not to be included in the 2025 SDD Core rulebook version 1.0.</b></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</p>	<p>Supports the PSEMWG Change Proposal <b>for this cycle</b>. 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</p>



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		<p>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><b>Not to be included in the 2025 SDD Core rulebook version 1.0.</b></p>	<p>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 <b>five</b> 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 specification.</p>





## 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. <b>For inclusion in the 2025 SDD B2B rulebook version 1.0.</b>	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. <b>Not to be included in the 2025 SDD B2B rulebook version 1.0.</b>	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 <b>for this cycle</b> . 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
		<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><b>Not to be included in the 2025 SDD B2B rulebook version 1.0.</b></p>	<p>cycle for all <b>five</b> 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 specification.</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</p>	<p>Supports the PSEMWG Change Proposal. The STP MSG considers that the possibility of transporting the Commercial Trade Names adds value to all four SEPA payment scheme rulebooks. It increases the transparency for retail payment end-users. The STP MSG understands that the 2019 version of the ISO 20022 standard does not foresee a dedicated message element for this information. A change request to ISO 20022 to foresee a dedicated message element can be valuable but this should be driven by the payment use cases under the SCT</p>



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		<p>attributes. 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. <b>To be included in the 2025 SDD B2B rulebook version 1.0.</b> <b>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.</b></p>	<p>schemes and the SDD schemes. Such dedicated field can be useful for SDD collections but possibly not for SCT (Inst) transactions (unless potentially in combination with Request-To-Pay). The STP MSG considered a number of existing message elements that could be a workaround for the 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.</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 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). 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</p>	<p>Supports the PSEMWG Change Proposal <b>for this cycle</b>. 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</p>



Item	Change request title	EPC PSEMWG Change Proposal	STP MSG position
		<p>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><b>Not to be included in the 2025 SDD B2B rulebook version 1.0.</b></p>	<p>cycle for all <b>four</b> 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.</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><b>Not to be included in the 2025 SDD B2B rulebook version 1.0.</b></p>	Supports the PSEMWG Change Proposal.
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</p>	Supports the PSEMWG Change Proposal <b>for this cycle</b> . 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
		<p>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><b>Not to be included in the 2025 SDD B2B rulebook version 1.0.</b></p>	<p>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 <b>five</b> 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 specification.</p>



## 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. <b>For inclusion in the 2025 OCT Inst rulebook version 1.0.</b>	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. <b>For inclusion in the 2025 OCT Inst rulebook version 1.0.</b>	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. <b>Not to be included in the 2025 OCT Inst rulebook version 1.0.</b>	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 <b>for this cycle</b> . 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
		<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.  <b>Not to be included in the 2025 OCT Inst rulebook version 1.0.</b></p>	<p>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 <b>five</b> 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 specification.</p>



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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><b>To be included in the 2025 OCT Inst rulebook version 1.0.</b></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><b>Not to be included in the 2025 OCT Inst rulebook version 1.0.</b></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>	Supports the OLO TF Change Proposal <b>for this cycle</b> . 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 <b>five</b> EPC payment





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		<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 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) 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><b>Not to be included in the 2025 OCT Inst rulebook version 1.0.</b></p>	<p>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 specification.</p>



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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>Supports the OLO TF Change Proposal <b>for this cycle</b>. 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 <b>five</b> 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</p>



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		<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><b>Not to be included in the 2025 OCT Inst rulebook version 1.0.</b></p>	<p>adopted message element specification.</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><b>Not to be included in the 2025 OCT Inst rulebook version 1.0.</b></p>	<p>Supports the OLO TF Change Proposal.</p>
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><b>To be included in the 2025 OCT Inst rulebook version 1.0.</b></p>	<p>Supports the OLO TF Change Proposal.</p>
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><b>For inclusion with the modifications as described in the OLO TF recommendation for the public consultation, in the 2025 OCT Inst</b></p>	<p>Supports the OLO TF Change Proposal.</p>



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		<p>rulebook version 1.0.</p> <p><b>Distinction to be made between the incoming and outgoing OCT Inst transaction flows:</b></p> <p><b><u>INCOMING:</u></b>                      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><b><u>OUTGOING:</u></b>                      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><b>Not to be included in the 2025 OCT Inst rulebook version 1.0.</b></p>	Supports the OLO TF Change Proposal.



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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><b>Not to be included in the 2025 OCT Inst rulebook version 1.0.</b></p>	Supports the OLO TF Change Proposal.
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><b>For inclusion in the 2025 OCT Inst rulebook version 1.0.</b></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><b>For inclusion in the 2025 OCT Inst rulebook version 1.0.</b></p>	Supports the OLO TF Change Proposal.