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POSITION OF THE SCHEME END-USER FORUM (SEUF)

2016 SEMWG CHANGE PROPOSALS FOR THE EPC SEPA SCHEME RULEBOOKS

1. Background

All submitted change requests to modify the EPC SEPA rulebooks during the 2016 EPC SEPA Scheme Change Management cycle had been published for a three-month public consultation in the second quarter of the 2016.

Following this three-month public consultation, the EPC Scheme Evolution and Maintenance Working Group (SEMWG) collected and consolidated the comments received from all scheme participants and stakeholders during this public consultation.

The SEMWG analysed the expressed support and the comments received for each change request. It then developed change proposals based on the level of support and the comments received from the public consultation.

The SEMWG consolidated its 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 SEPA scheme rulebook:

- EPC 166-16 v0.4 for the SEPA Credit Transfer (SCT) rulebook
- EPC 167-16 v0.4 for the SEPA Direct Debit (SDD) Core rulebook
- EPC 168-16 v0.4 for the SDD Business-to-Business (B2B) rulebook

The above-mentioned versions of the Change Proposal Submission Documents were then submitted to the August 2016 meetings of the Scheme End-User Forum (SEUF) and the EPC Scheme Technical Forum (ESTF) (i.e. the EPC Stakeholder Fora) and to the September 2016 meeting of the EPC Scheme Management Board (SMB).

2. Role of the EPC Stakeholder Fora during the EPC SEPA Scheme Change Management cycle

Section 4.4 of the EPC Scheme Management Internal Rules (SMIRs) indicates that the SEUF and the ESTF each separately are 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 communicated to the SMB.

The SMB will then deliberate on the Change Proposal Submission Document from the SEMWG and the position documents from the SEUF and the ESTF. The SMB shall finally determine whether or not to accept a Change Proposal after consideration of the position from the EPC Stakeholder Fora in accordance with section 4.2.5 of the SMIRs.

This SEUF 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 SMB on each Change Proposal.



3. SEUF position on the 2016 Change Proposals for the SCT Rulebook

Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
1	General rules on responding to SCT recall requests	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SCT Rulebook.	SEUF supports the SEMWG Change Proposal.
8	Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SCT Rulebook.	SEUF supports the SEMWG Change Proposal.
11	new SEPA Scheme Rulebook and Implementation Guidelines for card payments	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2017 SCT Rulebook.	SEUF supports the SEMWG Change Proposal.
12	Implementation of the purpose code 'IBAN Check Failed' for all SEPA payments	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2017 SCT Rulebook.	SEUF supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
13	Extension of the use of existing technical r-transaction reason codes and the introduction of new technical r-transaction reason codes for specific pain and pacs messages	<p>A majority of EPC scheme participants (via national banking communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that other contributors do support the change request. SEPA-scheme compliant Clearing and Settlement Mechanisms (CSMs) should discuss this change request and come to a consensus among them. It is proposed that the ESTF takes up this point as a work item.</p> <p>Not to be included in the 2017 SCT Rulebook.</p>	SEUF supports the SEMWG Change Proposal.
14	Assign clear responsibilities to scheme participants and CSMs for executing those SEPA Usage Rules defined in the interbank Implementation Guidelines	<p>A majority of EPC scheme participants (via national banking communities or via individual comments) do not wish to take up this change request in the scheme. However, it is noted that a number of the other contributors do support the change request. A discussion should first be held between the EPC and the SEPA scheme-compliant CSMs before further responsibilities can be assigned to CSMs through the rulebook. Such discussion can be held within the ESTF.</p> <p>Not to be included in the 2017 SCT Rulebook.</p>	SEUF supports the SEMWG Change Proposal.
17	The introduction of LEI in the EPC SEPA schemes	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SCT Rulebook</p>	SEUF supports the SEMWG Change Proposal.
18	Request for clarification on the version of the ISO pain messages in the Rulebooks	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation</p>	SEUF supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SCT Rulebook</p>	
19	Clarification in business requirements for AT-05 for structured remittance info	<p>A majority of EPC scheme participants (via national banking communities or via individual comments) do not wish to take up this change request in the scheme. Apart of the support from the corporate treasurers' sector, there is a number of other contributors expressing no support to this change request.</p> <p>Not to be included in the 2017 SCT Rulebook</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request for implementation in 2018.</p> <p>Note: Should the Change Request not be supported by the Scheme Management Board (SMB) then SEUF suggests further analysis in 2017 to find a solution in time for the next release of the Rulebook.</p>
20	Allow contemporaneous presence of Unstructured and Structured remittance info in payment messages	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. There is no exhaustive support to this change request among the other contributors.</p> <p>The EPC collected further information about an Additional Optional Service (AOS) used in one national community allowing the contemporaneous presence of Unstructured and Structured remittance info in payment messages:</p> <p style="padding-left: 40px;">In this AOS, the Originator sends to the Originator Bank one occurrence of 140 characters unstructured information and up to 999</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request for implementation in 2018.</p> <p>Note: Should the Change Request not be supported by the Scheme Management Board (SMB) then SEUF suggests further analysis in 2017 to find a</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>occurrences of structured information (creditor references).</p> <p>The Originator Bank transfers further only the structured information to the Beneficiary Bank if it supports the AOS or only the 140 characters of unstructured information, if the Beneficiary Bank does not support the AOS. So the Beneficiary receives the remittance information either in structured or unstructured format.</p> <p>If the Beneficiary had received both the structured and unstructured information, the Beneficiary would ignore the unstructured information, as the reconciliation process with structured information is totally automatic, or in worse scenario, the unstructured information would prevent the automatic handling of the payment.</p> <p>Not to be included in the 2017 SCT Rulebook</p>	<p>solution in time for the next release of the Rulebook.</p>
21	<p>Increase space in the payment messages for the <u>Unstructured</u> remittance info</p>	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. There is a majority among the other contributors expressing their support to this change request.</p> <p>The SEMWG highlights that the maximum number of 140 characters for remittance information is in force since January 2008. The 2016 public consultation does not highlight that a wide variety of other business sectors and consumers share a similar need for a higher maximum number of characters for remittance information. The SEMWG assumes that other solutions outside the payment processing may be already there to support the additional information needs for specific sectors.</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request for implementation in 2018.</p> <p>Note: Should the Change Request not be supported by the Scheme Management Board (SMB) then SEUF suggests further analysis in 2017 to find a solution in time for the next release of the Rulebook.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		Not to be included in the 2017 SCT Rulebook	
22	Increase space in the payment messages for the <u>Structured</u> remittance info	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. There is a number of other contributors expressing their support to this change request.</p> <p>The SEMWG highlights that the maximum number of 140 characters for remittance information is in force since January 2008. The 2016 public consultation does not highlight that a wide variety of other business sectors and consumers share a similar need for a higher maximum number of characters for remittance information. The SEMWG assumes that other solutions outside the payment processing may be already there to support the additional information needs for specific sectors.</p> <p>Not to be included in the 2017 SCT Rulebook</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request for implementation in 2018.</p> <p>Note: Should the Change Request not be supported by the Scheme Management Board (SMB) then SEUF suggests further analysis in 2017 to find a solution in time for the next release of the Rulebook.</p>
23	Forward to the beneficiary the IBAN and address of the originator	<p>The majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>However, a number of contributors addressed national data protection concerns when sharing the concerned attributes with the Beneficiary via the Beneficiary Bank located in a SEPA country different than the country of the Originator Bank.</p> <p>The SEMWG realises that there is a lack of a harmonised level playing field in the legislation of</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request but the impact of the General Data Protection Regulation (GDPR) should be carefully analysed before implementation.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>national data protection among the SEPA countries which do not support a unique implementation of the change request. There is furthermore no guarantee that the Beneficiary Bank is able to comply with the national data protection legislation to be respected by the Originator Bank. Including this change request would create fragmentation in the delivery of bank-to-customer credit transfer information among the SEPA countries.</p> <p>Not to be included in the 2017 SCT Rulebook</p>	
24	<p>Additional clarification on the content (with examples) to be inserted in AT-09, AT-10 AT-24 and AT-29</p>	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>The SEMWG instead proposes to take up the description of the concerned attributes, their purpose and examples of codes in the EPC SCT-SDD Clarification Paper (EPC348-12).</p> <p>Not to be included in the 2017 SCT Rulebook</p>	<p>SEUF supports the SEMWG Change Proposal.</p>
29	<p>Amendment to the SCT Return procedure allowing the Beneficiary Bank to return the funds when requested by the Beneficiary</p>	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SCT Rulebook</p>	<p>SEUF supports the SEMWG Change Proposal.</p>
32	<p>Amendment to Chapter '1.4 Character Set' of the Customer-to-Bank and Inter-Bank IGs</p>	<p>The majority of EPC scheme participants (via national banking communities or via individual comments) to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. There is no outspoken majority</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		among the other contributors expressing their support to this change request. Not to be included in the 2017 SCT Rulebook	
34	The category purpose of the credit transfer (AT-45) - collection (AT-59) to become mandatory	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2017 SCT Rulebook	SEUF supports the SEMWG Change Proposal.
35	New reason code for AT-48 (The SCT Recall reason code)	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2017 SCT Rulebook	SEUF supports the SEMWG Change Proposal.
36	Amendment to section 2.1 of the Scheme Management Internal Rules (SMIRs)	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SCT Rulebook	SEUF supports the SEMWG Change Proposal.
37	Making storage location for additional customer-to-customer information available outside the payment transaction	Views among contributors to the 2016 public consultation representing the EPC scheme participants are mixed. A large number of the other contributors do not support the SEMWG recommendation that this change request can be part of the scheme. Not to be included in the 2017 SCT Rulebook Nevertheless the EPC will further analyse alternative ways forward to cover the current demand of additional customer-to-customer information taking	SEUF supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		the comments received during the consultation into consideration.	
38	Amendments to section 3.2.3.5 of the Scheme Management Internal Rules (SMIRs) and Rulebook section 5.6	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2017 SCT Rulebook</p>	SEUF supports the SEMWG Change Proposal.
39	Inclusion of SCT inquiries	<p>Views among contributors to the 2016 public consultation representing the EPC scheme participants are mixed. A large number of the other contributors do support the SEMWG recommendation that this change request can be part of the scheme.</p> <p>The SEMWG considered the views received and proposes to make this change request effective as of November 2018.</p> <p>In case the SMB decides to make this change request part of the SCT scheme, the SEMWG will then analyse to include this change request</p> <ul style="list-style-type: none"> • Either already in the 2017 SCT Rulebook version 1.0 published in November 2016 with an effective date only in November 2018 for this specific process or • In a separate 2018 SCT Rulebook version 1.0 with a publication date either in in 2016 or in 2017 	SEUF supports the SEMWG Change Proposal.
40	Inclusion of 'Recall Request by the Originator'	A large majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.	SEUF supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>The SEMWG considered the views received and proposes to make this change request effective as of November 2018.</p> <p>It further proposes to rename this SCT Recall reason type into "Request for recall by the Originator".</p> <p>In case the SMB decides to make this change request part of the SCT scheme, the SEMWG will then analyse to include this change request</p> <ul style="list-style-type: none">• Either already in the 2017 SCT Rulebook version 1.0 published in November 2016 with an effective date only in November 2018 for this specific SCT Recall reason or• In a separate 2018 SCT Rulebook version 1.0 with a publication date either in in 2016 or in 2017	



4. SEUF position on the 2016 Change Proposals for the SDD Core Rulebook

Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
2	Reference to separate EPC guide on SDD r-transaction reason codes	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SDD Core Rulebook	SEUF supports the SEMWG Change Proposal.
3	Additional r-transaction reasons under 'Return' for AT-R3	The majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SDD Core Rulebook	SEUF supports the SEMWG Change Proposal.
4	This suggestion has been withdrawn by the contributor	Not applicable	Not applicable
6	Removal of Annex IX Advance Mandate Information (AMI)	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. Removal of the Annex IX from the 2017 SDD Core Rulebook	SEUF supports the SEMWG Change Proposal.
7	Review of SDD Annex VII 'e-Mandates' linked to BIC debtor bank	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SDD Core Rulebook	SEUF supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
8	Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SDD Core Rulebook	SEUF supports the SEMWG Change Proposal.
9	Mandate amendment for change of creditor identifier	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SDD Core Rulebook	SEUF supports the SEMWG Change Proposal.
10	Usage rules for the exchange rate for SDD Core Refunds	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2017 SDD Core Rulebook	SEUF supports the SEMWG Change Proposal.
12	Implementation of the purpose code 'IBAN Check Failed' for all SEPA payments	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2017 SDD Core Rulebook	SEUF supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
13	Extension of the use of existing technical r-transaction reason codes and the introduction of new technical r-transaction reason codes for specific pain and pacs messages	<p>A majority of EPC scheme participants (via national banking communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that other contributors do support the change request. The SEMWG suggests that the SEPA-scheme compliant Clearing and Settlement Mechanisms (CSMs) should discuss this change request and come to a consensus among them. The SEMWG is of the opinion that this topic falls outside the scheme rulebook and it proposes that the ESTF takes up this point as a work item.</p> <p>Not to be included in the 2017 SDD Core Rulebook.</p>	SEUF supports the SEMWG Change Proposal.
14	Assign clear responsibilities to scheme participants and CSMs for executing those SEPA Usage Rules defined in the interbank Implementation Guidelines	<p>A majority of EPC scheme participants (via national banking communities or via individual comments) do not wish to take up this change request in the scheme. The views of the other contributors are mixed on this change request. The SEMWG suggests that a discussion should first be held between the EPC and the SEPA scheme-compliant clearing and settlement mechanisms (CSMs) before further responsibilities can be assigned to CSMs through the rulebook. Such discussion can be held within the ESTF.</p> <p>Not to be included in the 2017 SDD Core Rulebook.</p>	SEUF supports the SEMWG Change Proposal.
15	Additional SDD r-tx reason codes for debtor driven reasons-whitelisting	<p>The views of the EPC scheme participants (via national banking communities or via individual comments) are mixed on this change request. However, it is noted that a number of the other contributors do support the change request.</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		Not to be included in the 2017 SDD Core Rulebook.	
17	The introduction of LEI in the EPC SEPA schemes	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SDD Core Rulebook</p>	SEUF supports the SEMWG Change Proposal.
18	Request for clarification on the version of the ISO pain messages in the Rulebooks	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SDD Core Rulebook</p>	SEUF supports the SEMWG Change Proposal.
25	Clarification in business requirements for AT-22 for structured remittance info	<p>A majority of EPC scheme participants (via national banking communities or via individual comments) do not wish to take up this change request in the scheme. The views of the other contributors are mixed on this change request.</p> <p>Not to be included in the 2017 SDD Core Rulebook</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the change request for implementation in 2018.</p> <p>Note: Should the Change Request not be supported by the Scheme Management Board (SMB) then SEUF suggests further analysis in 2017 to find a solution in time for</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
			the next release of the Rulebook.
26	Allow contemporaneous presence of Unstructured and Structured remittance info in payment messages	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. There is no exhaustive support to this change request among the other contributors.</p> <p>The EPC collected further information about an Additional Optional Service (AOS) used in one national community allowing the contemporaneous presence of Unstructured and Structured remittance info in SCT payment messages:</p> <p>In this AOS, the Originator sends to the Originator Bank one occurrence of 140 characters unstructured information and up to 999 occurrences of structured information (creditor references).</p> <p>The Originator Bank transfers further only the structured information to the Beneficiary Bank if it supports the AOS or only the 140 characters of unstructured information, if the Beneficiary Bank does not support the AOS. So the Beneficiary receives the remittance information either in structured or unstructured format.</p> <p>If the Beneficiary had received both the structured and unstructured information, the Beneficiary would ignore the unstructured information, as the reconciliation process with structured information is totally automatic, or in worse scenario, the unstructured information</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request for implementation in 2018.</p> <p>Note: Should the Change Request not be supported by the Scheme Management Board (SMB) then SEUF suggests further analysis in 2017 to find a solution in time for the next release of the Rulebook.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>would prevent the automatic handling of the payment.</p> <p>Not to be included in the 2017 SDD Core Rulebook</p>	
27	<p>Additional clarification on the content (with examples) to be inserted in AT-27, AT-37 and AT-39</p>	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>The SEMWG instead proposes to take up the description of the concerned attributes, their purpose and examples of codes in the EPC SCT-SDD Clarification Paper (EPC348-12).</p> <p>Not to be included in the 2017 SDD Core Rulebook.</p>	<p>SEUF supports the SEMWG Change Proposal.</p>
28	<p>Amendment of attributes present in DS-06 "Bank to Customer Direct Debit Information" and business rules for debtor PSPs</p>	<p>The majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>However, a number of contributors addressed national data protection concerns when sharing the concerned attributes with the Debtor via the Debtor Bank located in a SEPA country different than the country of the Creditor Bank.</p> <p>The SEMWG realises that there is a lack of a harmonised level playing field in the legislation of national data protection among the SEPA countries which do not support a unique implementation of the change request. There is furthermore no guarantee</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request but only in case the information can be presented electronically to the Debtor (i.e. a Debtor PSP may drop received extended reference party information and not make it available to a Debtor who uses an interface which does not</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>that the Debtor Bank is able to comply with the national data protection legislation to be respected by the Creditor Bank. Including this change request would create fragmentation in the delivery of bank-to-customer direct debit information among the SEPA countries.</p> <p>Not to be included in the 2017 SDD Core Rulebook.</p>	<p>comply with the ISO 20022 XML standard).</p>
30	<p>Extension of the reversal period for the creditor from 5 days to 10 inter-bank business days</p>	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SDD Core Rulebook</p>	<p>SEUF supports the SEMWG Change Proposal.</p>
32	<p>Amendment to Chapter '1.4 Character Set' of the Customer-to-Bank and Inter-Bank IGs</p>	<p>The majority of EPC scheme participants (via national banking communities or via individual comments) to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. The views of the other contributors are mixed on this change request.</p> <p>Not to be included in the 2017 SDD Core Rulebook</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request.</p>
34	<p>The category purpose of the credit transfer (AT-45) - collection (AT-59) to become mandatory</p>	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SDD Core Rulebook</p>	<p>SEUF supports the SEMWG Change Proposal.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
36	Amendment to section 2.1 of the Scheme Management Internal Rules (SMIRs)	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2017 SDD Core Rulebook</p>	SEUF supports the SEMWG Change Proposal.
37	Making storage location for additional customer-to-customer information available outside the payment transaction	<p>Views among contributors to the 2016 public consultation representing the EPC scheme participants are mixed. A number of the other contributors do not support the SEMWG recommendation that this change request can be part of the scheme.</p> <p>Not to be included in the 2017 SDD Core Rulebook</p> <p>Nevertheless the EPC will further analyse alternative ways forward to cover the current demand of additional customer-to-customer information taking the comments received during the consultation into consideration.</p>	SEUF supports the SEMWG Change Proposal.
38	Amendments to section 3.2.3.5 of the Scheme Management Internal Rules (SMIRs) and Rulebook section 5.6	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2017 SDD Core Rulebook</p>	SEUF supports the SEMWG Change Proposal.



5. SEUF position on the 2016 Change Proposals for the SDD B2B Rulebook

Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
2	Reference to separate EPC guide on SDD r-transaction reason codes	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SDD B2B Rulebook	SEUF supports the SEMWG Change Proposal.
3	Additional r-transaction reasons under 'Return' for AT-R3	The majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SDD B2B Rulebook	SEUF supports the SEMWG Change Proposal.
4	This suggestion has been withdrawn by the contributor	Not applicable	Not applicable
5	Inclusion of 'Debtor deceased' as r-transaction reason	The majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2017 SDD B2B Rulebook	SEUF supports the SEMWG Change Proposal.
6	Removal of Annex IX Advance Mandate Information (AMI)	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme. Removal of the Annex IX from the 2017 SDD B2B Rulebook	SEUF supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
7	Review of SDD Annex VII 'e-Mandates' linked to BIC debtor bank	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2017 SDD B2B Rulebook</p>	SEUF supports the SEMWG Change Proposal.
8	Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2017 SDD B2B Rulebook</p>	SEUF supports the SEMWG Change Proposal.
9	Mandate amendment for change of creditor identifier	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2017 SDD B2B Rulebook</p>	SEUF supports the SEMWG Change Proposal.
12	Implementation of the purpose code 'IBAN Check Failed' for all SEPA payments	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SDD B2B Rulebook</p>	SEUF supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
13	Extension of the use of existing technical r-transaction reason codes and the introduction of new technical r-transaction reason codes for specific pain and pacs messages	<p>A majority of EPC scheme participants (via national banking communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that other contributors do support the change request.</p> <p>The SEMWG suggests that the SEPA-scheme compliant Clearing and Settlement Mechanisms (CSMs) should discuss this change request and come to a consensus among them. The SEMWG is of the opinion that this topic falls outside the scheme rulebook and it proposes that the ESTF takes up this point as a work item.</p> <p>Not to be included in the 2017 SDD B2B Rulebook.</p>	SEUF supports the SEMWG Change Proposal.
14	Assign clear responsibilities to scheme participants and CSMs for executing those SEPA Usage Rules defined in the interbank Implementation Guidelines	<p>A vast majority of EPC scheme participants (via national banking communities or via individual comments) do not wish to take up this change request in the scheme. The views of the other contributors are mixed on this change request.</p> <p>The SEMWG suggests that a discussion should first be held between the EPC and the SEPA scheme-compliant clearing and settlement mechanisms (CSMs) before further responsibilities can be assigned to CSMs through the rulebook. Such discussion can be held within the ESTF.</p> <p>Not to be included in the 2017 SDD B2B Rulebook.</p>	SEUF supports the SEMWG Change Proposal.
15	Additional SDD r-tx reason codes for debtor driven reasons-whitelisting	<p>The views of the EPC scheme participants (via national banking communities or via individual comments) are mixed on this change request. However, it is noted that a number of the other contributors do support the change request.</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		Not to be included in the 2017 SDD B2B Rulebook.	
16	Extension of the SDD B2B return period with one additional day	There is a majority among the EPC scheme participants (via national banking communities or via individual comments) in favour of this change request. A large number of the other contributors do support the change request. For inclusion in the 2017 SDD B2B Rulebook	SEUF supports the SEMWG Change Proposal.
17	The introduction of LEI in the EPC SEPA schemes	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2017 SDD B2B Rulebook	SEUF supports the SEMWG Change Proposal.
18	Request for clarification on the version of the ISO pain messages in the Rulebooks	The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. Not to be included in the 2017 SDD B2B Rulebook	SEUF supports the SEMWG Change Proposal.
25	Clarification in business requirements for AT-22 for structured remittance info	A majority of EPC scheme participants (via national banking communities or via individual comments) do not wish to take up this change request in the scheme. The views of the other contributors are mixed on this change request. Not to be included in the 2017 SDD B2B Rulebook	SEUF does not support the SEMWG Change Proposal. SEUF supports the change request for implementation in 2018.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
			<p>Note: Should the Change Request not be supported by the Scheme Management Board (SMB) then SEUF suggests further analysis in 2017 to find a solution in time for the next release of the Rulebook.</p>
26	<p>Allow contemporaneous presence of Unstructured and Structured remittance info in payment messages</p>	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. There is no exhaustive support to this change request among the other contributors.</p> <p>The EPC collected further information about an Additional Optional Service (AOS) used in one national community allowing the contemporaneous presence of Unstructured and Structured remittance info in SCT payment messages:</p> <p>In this AOS, the Originator sends to the Originator Bank one occurrence of 140 characters unstructured information and up to 999 occurrences of structured information (creditor references).</p> <p>The Originator Bank transfers further only the structured information to the Beneficiary Bank if it supports the AOS or only the 140 characters of unstructured information, if the Beneficiary Bank does not support the AOS. So the Beneficiary receives the remittance information either in structured or unstructured format.</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the change request for implementation in 2018.</p> <p>Note: Should the Change Request not be supported by the Scheme Management Board (SMB) then SEUF suggests further analysis in 2017 to find a solution in time for the next release of the Rulebook.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>If the Beneficiary had received both the structured and unstructured information, the Beneficiary would ignore the unstructured information, as the reconciliation process with structured information is totally automatic, or in worse scenario, the unstructured information would prevent the automatic handling of the payment.</p> <p>Not to be included in the 2017 SDD B2B Rulebook</p>	
27	<p>Additional clarification on the content (with examples) to be inserted in AT-27, AT-37 and AT-39</p>	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>The SEMWG instead proposes to take up the description of the concerned attributes, their purpose and examples of codes in the EPC SCT-SDD Clarification Paper (EPC348-12).</p> <p>Not to be included in the 2017 SDD B2B Rulebook</p>	<p>SEUF supports the SEMWG Change Proposal.</p>
28	<p>Amendment of attributes present in DS-06 "Bank to Customer Direct Debit Information" and business rules for debtor PSPs</p>	<p>The majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>However, a number of contributors addressed national data protection concerns when sharing the concerned attributes with the Debtor via the Debtor Bank located in a SEPA country different than the country of the Creditor Bank.</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request but only in case the information can be presented electronically to the Debtor (i.e. a Debtor PSP may drop received extended reference party</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>The SEMWG realises that there is a lack of a harmonised level playing field in the legislation of national data protection among the SEPA countries which do not support a unique implementation of the change request. There is furthermore no guarantee that the Debtor Bank is able to comply with the national data protection legislation to be respected by the Creditor Bank. Including this change request would create fragmentation in the delivery of bank-to-customer direct debit information among the SEPA countries.</p> <p>Not to be included in the 2017 SDD B2B Rulebook</p>	<p>information and not make it available to a Debtor who uses an interface which does not comply with the ISO 20022 XML standard).</p>
31	Extension of the reversal period for the creditor from 5 days to 10 inter-bank business days	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SDD B2B Rulebook</p>	<p>SEUF supports the SEMWG Change Proposal.</p>
32	Amendment to Chapter '1.4 Character Set' of the Customer-to-Bank and Inter-Bank IGs	<p>The majority of EPC scheme participants (via national banking communities or via individual comments) to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. The views of the other contributors are mixed on this change request.</p> <p>Not to be included in the 2017 SDD B2B Rulebook</p>	<p>SEUF does not support the SEMWG Change Proposal.</p> <p>SEUF supports the Change Request.</p>
33	Extension of the SDD B2B return period with one additional day	<p>There is a majority among the EPC scheme participants (via national banking communities or</p>	<p>SEUF supports the SEMWG Change Proposal.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>via individual comments) in favour of this change request. A large number of the other contributors do support the change request.</p> <p>For inclusion in the 2017 SDD B2B Rulebook</p>	
34	The category purpose of the credit transfer (AT-45) - collection (AT-59) to become mandatory	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2017 SDD B2B Rulebook</p>	SEUF supports the SEMWG Change Proposal.
36	Amendment to section 2.1 of the Scheme Management Internal Rules (SMIRs)	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p> <p>For inclusion in the 2017 SDD B2B Rulebook</p>	SEUF supports the SEMWG Change Proposal.
37	Making storage location for additional customer-to-customer information available outside the payment transaction	<p>Views among contributors to the 2016 public consultation representing the EPC scheme participants are mixed.</p> <p>A number of the other contributors do not support the SEMWG recommendation that this change request can be part of the scheme.</p> <p>Not to be included in the 2017 SDD B2B Rulebook</p>	SEUF supports the SEMWG Change Proposal.
38	Amendments to section 3.2.3.5 of the Scheme Management Internal Rules (SMIRs) and Rulebook section 5.6	<p>The vast majority of EPC scheme participants (via national banking communities or via individual comments) and other contributors to the 2016 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.</p>	SEUF supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		For inclusion in the 2017 SDD B2B Rulebook Nevertheless the EPC will further analyse alternative ways forward to cover the current demand of additional customer-to-customer information taking the comments received during the consultation into consideration.	