



## Report on Public Consultation 2014 – SEPA Credit Transfer

Abstract	This document contains the results and comments received on the change requests submitted for public consultation on possible modifications to be introduced into the SEPA Credit Transfer Rulebook to take effect in November 2015.
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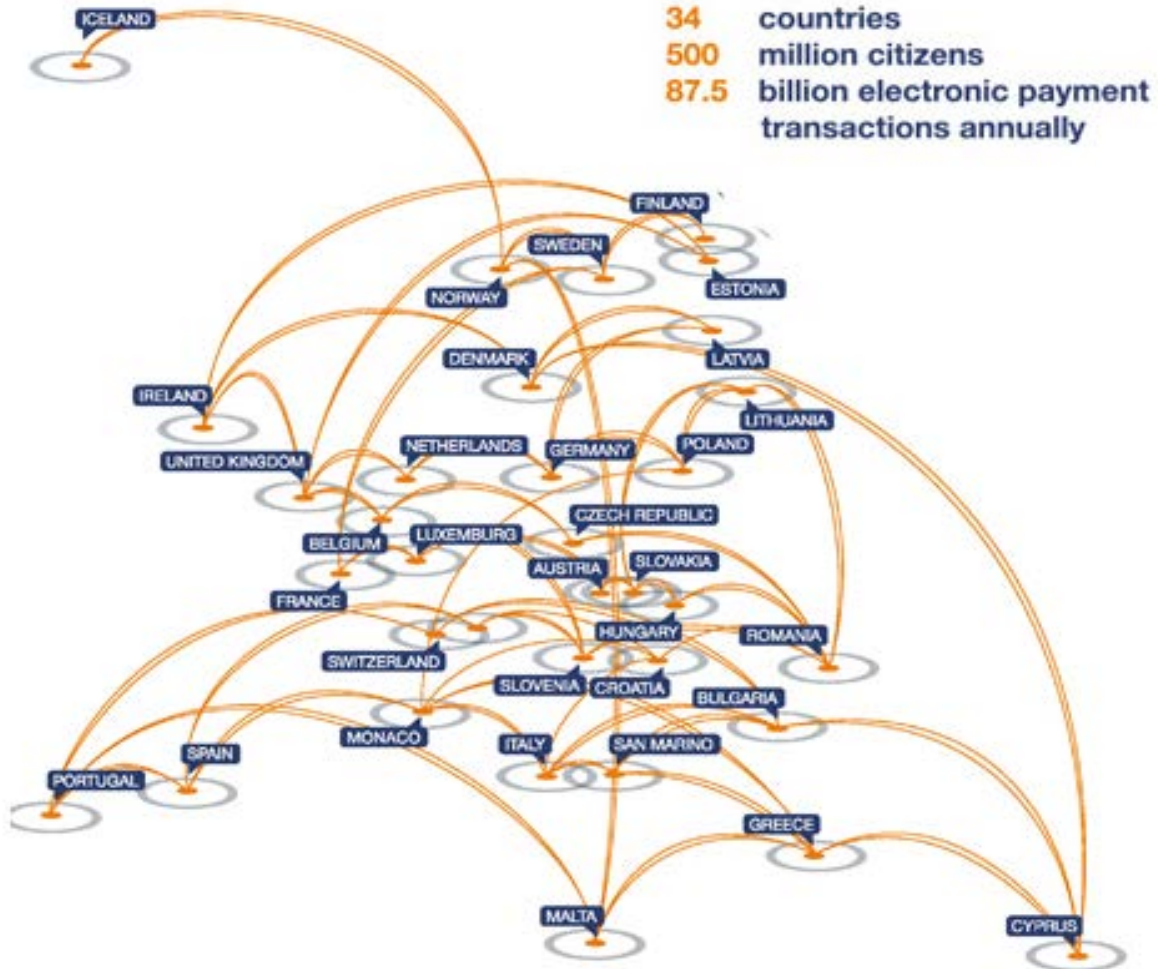
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# 1 Foreword: The Principles of SEPA Scheme Development

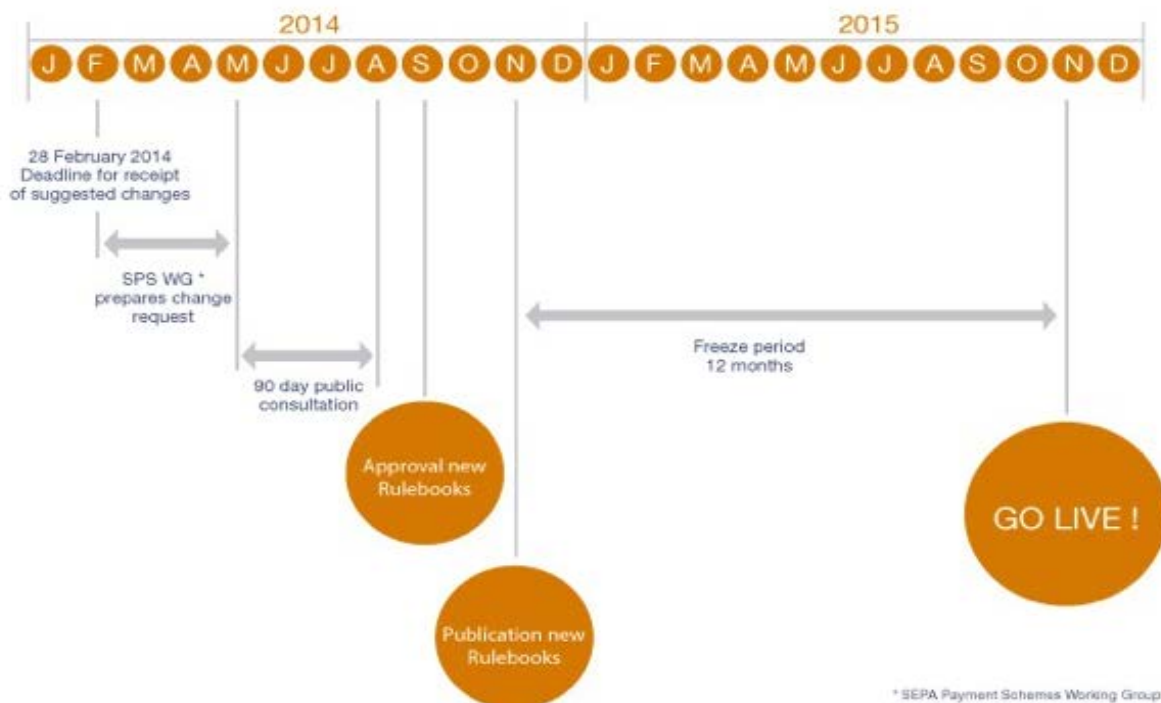
The Single Euro Payments Area (SEPA) payment schemes, as set out in the SEPA Credit Transfer (SCT) and SEPA Direct Debit (SDD) Rulebooks, evolve based on a transparent change management process adhered to by the European Payments Council (EPC). This evolution reflects changes in market needs and updates of technical standards developed by international standards bodies, such as the International Organization for Standardization. The principles governing the evolution of the SEPA Schemes are set out in section three of the SEPA Scheme Management Internal Rules.

## 1.1 EPC rulebook release management - important notice to all SEPA stakeholders: effective date of SCT and SDD Rulebook versions to be published in November 2014 will be 22 November 2015 (SWIFT 2015 Standards Release live date)

The EPC publishes updated versions of the rulebooks once annually in November of each year. In accordance with industry best practice, payment service providers and their suppliers therefore have sufficient lead time to address rulebook updates prior to such changes taking effect.

The next version of the SCT and SDD Rulebooks (SCT Rulebook version 8.0, SDD Core Rulebook version 8.0 and SDD Business to Business (B2B) Rulebook version 6.0), will be published in November 2014. Based on the established release management cycle, the updated versions will take effect on 22 November 2015.

SEPA Scheme Rulebook Change and Release Management Cycle



\* SEPA Payment Schemes Working Group



## **1.2 SEPA payment scheme development: EPC scheme change management**

The first step in the annual EPC scheme change management cycle is the introduction of suggestions for changes to the schemes by any interested party. Deadline for receipt of such suggestions was 28 February 2014.

In consideration of the suggestions received, the EPC SEPA Payments Working Group (SPS WG) develops a single change request document per rulebook (the SCT Rulebook, the SDD Core Rulebook and the SDD B2B Rulebook). The preparation of the change request documents involves analysis of the suggestions for changes received which may include, as appropriate, a cost-benefit analysis, dialogue with the initiator and market need analysis. Based on this review, the SPS WG issues a recommendation on how each change suggestion should be handled. All suggestions to modify the rulebooks received by the EPC are published on the EPC Website, permitting such a list to be openly viewed by all stakeholders.

The change requests are released for a three-month public consultation in May of each year. Taking into account comments received during the public consultation, the SPS WG completes a change proposal for approval by the EPC Plenary in September of each year. Proposed changes to the SEPA Schemes that find broad acceptance by all Scheme Participants and stakeholders are incorporated into the new rulebook versions - regardless of whether such a change is proposed by a payment service provider or customer representatives. Change requests that lack such broad support are not.



## 2 Executive Summary

The public consultation on possible modifications to be introduced into the SEPA Credit Transfer Rulebook to take effect in November 2015 ran from 19 May 2014 until 15 August 2014. The documents circulated for this public consultation were the document SEPA Credit Transfer Rulebook Change Request Consultation Document (EPC096-14) and the Response Template (EPC108-14) available on the [EPC Website](#). This report (EPC186-14) contains the feedback received on the change requests submitted for public consultation.

As a result of this public consultation, the SCT Rulebook version 8.0 has been updated to include an update in the category descriptions of Scheme applicants that are deemed automatically to be eligible under Rulebook section 5.4 on eligibility for participation. Among other changes in this section, the section includes banks authorised by the Central Bank of San Marino.

### 3 Overview of change requests submitted for public consultation in 2014

This section contains a summary of topics which were presented for consultation along with the recommendation of the EPC SEPA Payment Schemes Working Group (SPS WG) on the way forward.

#### 3.1 The recommendations of the SPS WG submitted for public consultation reflect the following options concerning the proposed way forward with regard to a specific change request:

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

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<sup>1</sup> A Scheme Participant is a payment service provider which has formally adhered to a SEPA Scheme.

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



- It is demonstrated that a sufficient number of stakeholders will make use of the new scheme.
- A cost-benefit analysis is provided.
- It complies with the SEPA Regulation or any other relevant Regulation.

### 3.2 Summary of Suggestions for Change and the proposed way forward as submitted for public consultation

Change Request item	Topic	Contributor	Recommendation of the SPS WG on the proposed way forward.
14	Time window extension to respond to a SCT Recall request (to 30 calendar days)	Slovakian Banking Association	Cannot be part of the existing scheme – <b>option e</b>
15	Abandon completely or extend to 13 months the current permitted timespan for launching a SCT recall request	Slovakian Banking Association	Cannot be part of the existing scheme – <b>option e</b>
17	Making storage location for additional customer-to-customer information available outside the payment transaction	SPS WG	Should be included in the scheme as an optional feature – <b>option c</b>
20	End-to-End (E2E) identification optional instead of mandatory in C2B and Interbank Implementation Guidelines	Betaalvereniging Nederland	Cannot be part of the existing scheme – <b>option e</b>
43	Harmonising pain format in the customer-to-bank (C2B) xml interfaces	BITKOM e.V.	No SPS WG recommendation defined
64	Make fields “Beneficiary Reference Party” and “Originator Reference Party” more visible	Association Française des Trésoriers d’Entreprises	Already provided for in the scheme – <b>option a</b>
67	Expand the reasons for SCT recall with “at the request of the payer” in AT-48 ‘The Recall reason code’	Bank Association of Slovenia	Cannot be part of the existing scheme – <b>option e</b>
70	Expand the reasons for SCT recall with “RequestedByCustomer” in AT-48 ‘The Recall reason code’	Swedbank	Cannot be part of the existing scheme – <b>option e</b>
71	Update of the Rulebook section 5.4 ‘Eligibility for Participation’	EPC Legal Support Group	Should be incorporated into the scheme – <b>option b</b>
73	Standardised interbank process including timelines to handle SCT status inquiries by Originator	German Banking Industry Committee	Cannot be part of the existing scheme – <b>option e</b>
80	Attribute 45 ‘Category purpose of the credit transfer’ (AT-45) to be mandatory instead of optional	Portuguese banking community	Cannot be part of the existing scheme – <b>option e</b>

81	Attribute 21 'Name of the Beneficiary' of the credit transfer (AT-21) to be optional instead of mandatory	Portuguese community	banking	Cannot be part of the existing scheme – <b>option e</b>
82	Extend time window to launch a SCT recall request from 10 to 20 Banking Business days	Portuguese community	banking	Cannot be part of the existing scheme – <b>option e</b>
83	Expand the reasons for SCT recall with “ordering request (undue payment)” in AT-48 ‘The Recall reason code’	Portuguese community	banking	Cannot be part of the existing scheme – <b>option e</b>

### 3.3 Summary of changes which will be included in the next version of the SCT Rulebook to align the rulebook with the SEPA Regulation or with any other relevant EU legislation (e.g., PSD).

[The contributors to this public consultation are welcome to comment on these changes.](#)

Ref.	Topic	Contributor	Way forward
<b>No items were identified that required a change to the Rulebook due to any particular EU legislation</b>			

### 3.4 Contributors to the public consultation

Contributions were received from 21 banks or banking communities and 14 other stakeholders.

The list of contributors can be found in Annex I.

## 4 Results in detail

### 4.1 # 14: Time window extension to respond to a SCT Recall request (to 30 calendar days)

#### 4.1.1 Description

This suggestion was made by The Slovakian Banking Association.

The Rulebook prescribes in CT-02.03 of section 4.3.2 that the Beneficiary Bank has to handle the SCT recall request and to provide a positive or negative response to this request within 10 Banking Business Days (BBDs). The suggestion is to extend this period of handling and responding to this SCT recall request to 30 calendar days as the current period of 10 Banking Business Days appears to be insufficient to the Beneficiary/Beneficiary Bank to respond to a SCT recall request.

#### 4.1.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**). If the investigation for a SCT recall takes more than 10 Banking Business Days, other channels could be used to inform the Originator Bank within 10 Banking Business Days that more time is needed to respond to the request for reclaiming the funds.

#### 4.1.3 Contributions and comments

The vast majority of EPC Scheme Participants via national banking communities and other contributors to the 2014 public consultation supported the SPS WG recommendation that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
Portuguese Banking Community	In some cases 10 business days are not enough to satisfy these requests
Shahid Ali - Business Analyst	But a correlation or point of reference how 10 days as standard is originated to be added. Not aware PSD has such time line. In case it is EPC then mention somewhere at least it is not PSD.
Dutch Payments Association (on behalf of Dutch banking community)	All SCT Recall requests must be handled as soon as possible
Febelfin (representing Belgian banking community)	The Recall procedure can be extended with the advice to react asap to have an optimal recuperation possibility. Contacting the impacted banks would take a lot of time and automatic Recall processing can be guaranteed with longer time period. Limitation on max 20-30 days is advised.
Hungarian Banking Association	The Hungarian banking community supports the proposal of the Slovak Banking Association. Contacting and getting response from the beneficiary may well take more than 10 banking business days. According to the majority view of the SPS WG of the EPC a longer response time window would be in conflict with the irrevocability rule of a credit transfer order as laid down in the PSD and the scheme may not support such claims. Therefore late responses should be forwarded on another channel and further steps will not fall under the scope of the SCT scheme.

Contributor	Comment Received
	Our community believes that it would be practical to extend the time window. 10 banking business day is an arbitrary limit which can also be challenged using the arguments above.
<b>Italian Banking Association (ABI)</b>	Just one bank agrees with the change request but suggests to extend the response to a SCT Recall request to a 20 calendar days.
<b>Ingenico</b>	10 business days should be sufficient in most of the cases
<b>Citibank NA London Branch</b>	<p>Would support the extension of the response window</p> <ol style="list-style-type: none"> <li>1. 10 days is oftentimes insufficient time to secure a response from clients on whether request should be actioned or rejected. We expect this to be more challenging for banks dealing with consumer clients where obtaining necessary approval is more difficult.</li> <li>2. Given current rules, handling of recalls beyond 10 days needs to be handled manually which contradicts the enhanced STP and automated processing which SEPA aims to enable. Further, legacy ACH infrastructure often permitted up to 30 days to respond to recalls enabling more opportunity to process payment msgs and instructions STP. With such a narrow window to facilitate straight-thru processing of recalls, SEPA looks to be an outdated and inferior alternative to the legacy systems it has replaced.</li> <li>3. Having to handle recall requests outside of the SEPA schema is creating a lot of manual work in the market which leaves payment flows at risk of errors as a result of manual handling.</li> <li>4. Further, the rulebook already mandates the specific circumstances under which a recall request can be instructed (i.e. in instances of duplicate, tech error, fraud). As such, there is no risk to the finality of valid Credit Transfers if such an extension to recall response window were permitted</li> </ol> <p>Would support extending the window in which to respond to a camt056 recall request to 15 Target business days</p>

## 4.2 # 15: Abandon completely or extend to 13 months the current permitted timespan for launching a SCT recall request

### 4.2.1 Description

This suggestion was made by Slovakian Banking Association.

The Rulebook prescribes in CT-02.01 of section 4.3.2 that the Originator Bank must check if the SCT had an execution date towards the CSM of less than 10 Banking Business Days to determine if the Originator Bank can actually initiate a SCT recall request. The suggestion is to abandon this maximum period of 10 Banking Business Days entirely or to extend the period to 13 months.

### 4.2.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**) to extend the current permitted timespan of 10 Banking Business Days to 13 months for the initiation of a SCT recall request. Extending this timespan will have an impact on the finality of the SCT. Furthermore, the SCT recall procedure has been put in place for three specific reasons only.

After 10 Banking Business Days, the Originator/ Originator Bank should use another channel outside the Scheme to try to reclaim the funds from the Beneficiary Bank/ Beneficiary for any erroneous, duplicate or fraudulent SCT.

The EPC will monitor the ongoing legislative process of the PSD2 with regard to recalls for necessary adjustments of the Rulebook.

### 4.2.3 Contributions and comments

The vast majority of EPC Scheme Participants via national banking communities and other contributors to the 2014 public consultation supported the SPS WG recommendation that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
Portuguese banking community	We propose to extend to 20 business days
Dutch Payments Association (on behalf of Dutch banking community)	Certainty of the payment must be guaranteed as soon as possible
Hungarian Banking Association	Our community proposes 30 calendar days especially with regard to customer initiated SCT recalls. The use of non SEPA messages hinders smooth transaction processing and the integrity of the scheme which we would like to avoid.
AITI - Italian Association of Corporate Treasurers	We agree that there needs to be certainty that the SCT is final, therefore it seems exaggerated to extend the time period too long.
EACT - European Association of Corporate Treasurers	We agree that there needs to be certainty that the SCT is final, therefore it seems exaggerated to extend the time period too long.
Citibank NA London Branch	Citi would argue that a 10 business day window in which to instruct a recall is oftentimes insufficient time to identify txns which rightly require recalls and execute these instructions. We have seen instances of production issues (duplicate payments, tech problems leading to incorrect txns etc) that have only been identified a number of days after incident occurred. The fact we may only have a day or so to initiate all these recalls can be challenging. In some cases, we have already passed this time period and have to go through this process outside of the SEPA schema.

<b>Contributor</b>	<b>Comment Received</b>
	<p>We would support extending the recall window up to 15 business days.</p> <p>Further, Citi agrees that the finality of valid transactions should not be put at risk. However, Citi would argue that there is no impact to such finality under this proposal. The process of camt056 provides that the receiving party of the original transactions being recalled has the right to accept or reject such a request. There is no risk to funds being debited from receiving party's account without their direct consent.</p> <p>Limiting window to 10 days means that operations teams need to initiate SWIFT 199 recalls to retrieve funds. There is not requirement for the counterparty bank to support 199s.</p> <p>Citi has observed instances whereby other banks are issuing camt056 recall requests beyond the 10 day window. Some clearing systems do not validate whether these camt 056 recalls are instructed within rulebook timeframes. As such, limiting recall window to 10 business days is not preventing banks from doing so, it merely means banks are issuing SEPA msgs beyond the remit of the EPC rulebook. Citi would argue that extending window and ensuring banks are adhering to the parameters of the rulebook would be more beneficial.</p> <p>Citi has also observed instances whereby local banks are rejecting camt056 recall requests that are correctly structured and within the 10 day window as they are claiming this does not align with local market practice (e.g. <i>Banking community deleted by EPC</i>) in the handling of recalls. This needs to be urgently addressed as it does not comply with rulebook and leads to significant manual effort to recall funds outside of SEPA schema.</p>
<b>ASSET (Spanish Association of CFOs)</b>	We agree that there needs to be certainty that the SCT is final, therefore it seems exaggerated to extend the time period too long.

### 4.3 # 17: Making storage location for additional customer-to-customer information available outside the payment transaction

#### 4.3.1 Description

This suggestion was made by the SPS WG.

The current SCT scheme permits the end-to-end carrying of remittance data on a structured or unstructured basis. The scheme rules allow for one repetition of the remittance information field of up to 140 characters to be included with the remittance information.

Earlier change requests from different stakeholder groups and banking communities asked for a possibility to use significantly larger remittance information. The present 140 characters of remittance information appear to be not enough for some users or communities in the SEPA area.

It is proposed to make additional customer-to-customer information available outside of the SCT payment message. The payment message would only carry the information of the location where the additional customer-to-customer information is stored. The additional data separated from the 140 characters of the remittance information can then be sent separately from the SCT payment message.

Additional data elements/ attributes that already exist in ISO 20022 (e.g., ISO 20022 Extended Remittance Advice message) can be taken up in the SCT Rulebook. These new attributes will store details of the location from where the additional customer-to-customer information can be retrieved.

It is emphasized that the current limited character set to be used in the SCT Scheme will remain unchanged. Furthermore, the additional attributes storing the location of the additional customer-to-customer information will be **optional fields**.

This means that only when the Originator provides information about the storage location of the additional customer-to-customer information in these optional fields, it is mandatory for the Originator Bank to transport this storage location information in these fields to the Beneficiary Bank. In case of an arrangement between the Beneficiary Bank and the Beneficiary, the information about the storage location could be made available. These details are sent together with the SCT message but are not part of the SCT payment.

#### 4.3.2 SPS WG analysis and recommendation

The SPS WG suggested incorporating the suggestion into the scheme as an optional feature (**option c**) and more specifically through the use of **optional fields**.

#### 4.3.3 Contributions and comments

Views among contributors to the 2014 public consultation representing both the demand and supply sides were mixed. However, in consideration of the overall comments from a majority of EPC Scheme Participants via national banking communities and other contributors received, it was concluded that the change suggestion cannot be part of the Scheme. Therefore, the change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
<b>STUZZA GmbH on behalf of the Austrian Banking Community</b>	The Austrian Banking Community is concerned about legal and security issues: since the payment message only carries the information of the (outside!) location of the additional C2C information, the content and form of information is beyond any checking procedures of involved banks. Therefore, banks must not be held responsible for any illegal or objectionable contents.
<b>Irish Payment Services Organisation</b>	Will cause confusion in marketplace where it's mandatory on one side i.e. Originating Bank. Should be resolved separately to payment chain.



<b>Contributor</b>	<b>Comment Received</b>
<b>French Banking Federation</b>	Option e
<b>BITKOM e.V.</b>	<p>The change request should not be implemented on legal grounds and because of high costs.</p> <p>The remittance information in a payment message turns up as the text on the account statement.</p> <p>At least in Germany but probably also in other countries this account statement is a legally necessary book-keeping voucher. Thus, there are several regulatory requirements to be fulfilled, e.g. the obligation to preserve records and the permanent accessibility over a period of ten years. This will cause high costs for saving the data and high complexity as additional customer-to-customer information can be stored in different format, like URL, Fax, Email, etc.</p> <p>We also expect high costs and high complexity of privacy protection as the remittance information most of the time contains private and confidential data that must be protected from unauthorized access.</p> <p>Finally the information on the account statement delivered by the CAMT or MT940 formats is used for automated booking. If relevant information is only found in additional customer-to-customer information outside of the SCT/SDD payment message it will complicate this process.</p> <p>Cannot be part of the existing scheme – option e</p>
<b>Shahid Ali - Business Analyst</b>	But this point is of big concern as every country is changing it and also Banks are changing it. A control is must on this C2B pain.
<b>Deutsche Telekom AG</b>	<p>The change request should not be implemented on legal grounds and because of high costs.</p> <p>The remittance information in a payment message turns up as the text on the account statement.</p> <p>At least in Germany but probably also in other countries this account statement is a legally necessary book-keeping voucher. Thus, there are several regulatory requirements to be fulfilled, e.g. the obligation to preserve records and the permanent accessibility over a period of ten years. This will cause high costs for saving the data and high complexity as additional customer-to-customer information can be stored in different format, like URL, Fax, Email, etc.</p> <p>We also expect high costs and high complexity of privacy protection as the remittance information most of the time contains private and confidential data that must be protected from unauthorized access.</p> <p>Finally the information on the account statement delivered by the CAMT or MT940 formats is used for automated booking. If relevant information is only found in additional customer-to-customer information outside of the SCT/SDD payment message it will complicate this process.</p> <p>Cannot be part of the existing scheme – option e</p>
<b>Dutch Payments Association (on behalf of Dutch banking community)</b>	<p>DO NOT include as optional feature.</p> <p>Optional features will be demanded by clients. This change has big impact throughout the whole payment chain. IT-impact is huge.</p> <p>If this change should be included as an option, then realization by November 2015 is not considered realistic.</p>
<b>Febelfin (representing Belgian banking community)</b>	It should be clear that the existing customer to customer information fields in the payment message should remain the first means for reconciliation of the payments.



<b>Contributor</b>	<b>Comment Received</b>
<b>Hungarian Banking Association</b>	The Hungarian community supports the proposal. We believe that the cost-benefit ratio of this change is especially favourable. However we do not agree that this piece of information can be optional in DS0x as the information is for the use of the beneficiary and therefore the beneficiary bank must provide this information to the beneficiary anyway.
<b>Italian Banking Association (ABI)</b>	A large majority of the SCT participants responding to the consultation disagree with the SPS WG recommendation as the solution of introducing the additional data elements/ attributes (e.g., ISO 20022 Extended Remittance Advice message) has an impact on the interbank space and the message standards without being compliant with several requests by different stakeholder groups on this topic. In fact this solution provides that customers have to recover additional details independently and at a later date with respect to the payment message. Responding Participants are evaluating to adopt the Finnish AOS as it meets better the demand to use significantly larger remittance information.
<b>Polish banking association</b>	There is no need for this kind of solution and its implementation would generate many costs.
<b>UK Payments Council</b>	This is subject to the EPC ensuring compliance with relevant legislation in this area e.g. FATF Recommendation 16/the Funds Transfer Regulation.
<b>Bank Association of Slovenia</b>	Slovenian banking community does not see added value of this proposal. We also do not have any requests by bank customers.
<b>Swiss banking community</b>	As such a field should be used, it must be mandatory for all participants on the beneficiary side (STP end-to-end).
<b>Ingenico</b>	Nothing against this change
<b>Lithuanian SEPA Coordination Committee</b>	We agree that an optional field should be used. However we think that longer implementation period is needed in order market participants could better analyse the effect of the new feature to the credit transfer service and would be able to accommodate properly.
<b>Club SEPA (represents software providers and consultants involved in SEPA project in France)</b> <a href="http://www.clubsepa.eu/les-membres-du-club/">http://www.clubsepa.eu/les-membres-du-club/</a>	Such new information must be done according to a ISO standard as used for the unstructured remittance information. It is necessary to have a maximum length for instance and the type of authorised characters.
<b>The Danish Bankers Association</b>	We strongly believe in the solution in order to be forward looking and accommodate the needs of customers. We would, however, prefer that the solution as soon as possible will be changed from optional to mandatory for the Creditor Bank to the Creditor when such customers are served via electronic channels.
<b>Handelsverband Deutschland (HDE)</b>	The change request should not be implemented on legal grounds and because of high costs. The remittance information in a payment message turns up as the text on the account statement. At least in Germany but probably also in other countries this account statement is a legally necessary book-keeping voucher. Thus, there are several regulatory requirements to be fulfilled, e.g. the obligation to preserve records and the permanent accessibility over a period of ten years. This will cause high costs for saving the data and high

<b>Contributor</b>	<b>Comment Received</b>
	<p>complexity as additional customer-to-customer information can be stored in different format, like URL, Fax, Email, etc.</p> <p>We also expect high costs and high complexity of privacy protection as the remittance information most of the time contains private and confidential data that must be protected from unauthorized access.</p> <p>Finally the information on the account statement delivered by the CAMT or MT940 formats is used for automated booking. If relevant information is only found in additional customer-to-customer information outside of the SCT/SDD payment message it will complicate this process.</p> <p>Cannot be part of the existing scheme – option e</p>
<b>AITI - Italian Association of Corporate Treasurers</b>	<p>Italian Corporates and AITI have for a long time raised requests for extended remittance information in the SEPA formats, asking to implement the full ISO Credit Transfer standard without the limitation decided by EPC and as already happens, even though with some limitations, in the Finnish SCT AOS. Any technical solution identified by SPS WG should be carefully analysed with end-users before inserting it in the rulebooks, since extended remittance information should be made available by the PSPs in the B2C ISO messages. The information on the account statement that is a legally necessary book-keeping document, delivered by the CAMT or MT940 formats is used by Corporates for automated booking. If relevant data could be found only in additional customer-to-customer information outside of the SCT payment message, the booking process will be more complicate. Furthermore if the service was optional, the option would have to be adopted by a large number of European PSPs in order to meaningfully work. We believe that the EPC should actively engage users in the development of the solution for extended remittance information at technical level and also make it mandatory for PSPs because if optional it not work in practice without a wide networks of banks offering the optional feature.</p>
<b>Nordea Banking Group</b>	<p>We strongly believe in the solution in order to be forward looking and accommodate the needs of customers.</p> <p>We would, however, prefer that the solution as soon as possible will be changed from optional to mandatory for the Creditor Bank to the Creditor when such customers are served via electronic channels.</p>
<b>EACT - European Association of Corporate Treasurers</b>	<p>EACT has for a long time raised requests for extended remittance information in the SEPA formats, asking to implement the full ISO Credit Transfer standard without the limitation decided by EPC and as already happens, even though with some limitations, in the Finnish SCT AOS. Any technical solution identified by SPS WG should be carefully analysed with end-users before inserting it in the rulebooks, since extended remittance information should be made available by the PSPs in the B2C ISO messages. The information on the account statement that is a legally necessary book-keeping document, delivered by the CAMT or MT940 formats is used by Corporates for automated booking. If relevant data could be found only in additional customer-to-customer information outside of the SCT payment message, the booking process will be more complicate. Furthermore if the service was optional, the option would have to be adopted by a large number of European PSPs in order to meaningfully work. We</p>

<b>Contributor</b>	<b>Comment Received</b>
	believe that the EPC should actively engage users in the development of the solution for extended remittance information at technical level and also make it mandatory for PSPs because if optional it not work in practice without a wide networks of banks offering the optional feature.
<b>Citibank NA London Branch</b>	Citi has no objection to this proposal however would be keen to understand how this functionality will work and what fields will be used to pass this information to the receiving party.

## 4.4 # 20: End-to-End (E2E) identification optional instead of mandatory in C2B and Interbank Implementation Guidelines

### 4.4.1 Description

This suggestion was made by the Betaalvereniging Nederland.

The End-to-End (E2E) identification is mandatory in the Customer-to-Bank (C2B) Implementation Guidelines (IGs). If this end-to-end identification is not given, the Interbank IGs of the Rulebook prescribe to provide 'NOTPROVIDED' in the End-to-End identification.

As this field appears to be seldom used by Originators and reporting of 'NOTPROVIDED' gives no useful information to the Beneficiary, the change suggestion is to make this field optional instead of mandatory in the Customer-to-Bank space and to delete the usage rule for the "End-to-End Identification" in the interbank space.

### 4.4.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**) at this point in time. The E2E identification field is currently mandatory in ISO.

### 4.4.3 Contributions and comments

The vast majority of EPC Scheme Participants via national banking communities and other contributors to the 2014 public consultation supported the SPS WG recommendation that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
<b>BITKOM e.V.</b>	If "NOT PROVIDED" is applied then it should not appear on the printed statement.
<b>Shahid Ali - Business Analyst</b>	This optional suggestion seems has originated due to mention of not provided in Rule Book. They are considering we do not have then it can be optional. This logic of Not Provided should be removed from the Rule Book and to be said as it has to be unique value for various Transaction(C-Level) of a Payment (B-Level). As this information is going to be key role for R-transaction information to Customer.
<b>Deutsche Telekom AG</b>	If "NOT PROVIDED" is applied then it should not appear on the printed statement.
<b>Dutch Payments Association (on behalf of Dutch banking community)</b>	Proposal to EPC: EPC asks for ISO change. E2E must be optional (Only when filled by originator (C2B) it must be passed through in payment chain).
<b>Equens SE</b>	Either the pain rule or the pacs rule should be changed in the ISO 20022 specification
<b>Handelsverband Deutschland (HDE)</b>	If "NOT PROVIDED" is applied then it should not appear on the printed statement.
<b>Citibank NA London Branch</b>	Citi would agree with this position. This is a change to be addressed via ISO, not the SEPA rulebook. Citi does have concerns around the usage of 'NOT PROVIDED' as a non-unique identifier and the widespread use of this in the market.

## 4.5 # 43: Harmonising pain format in the customer-to-bank (C2B) xml interfaces

### 4.5.1 Description

This suggestion was made by BITKOM e.V.

The ISO Standard 20022 forms the basis for the EPC SEPA xml format and the EPC SCT Implementation Guidelines provide a general template of possible data fields. A variety of national configurations of the payment initiation files (pain.x) had been created. These national variations need to be implemented in the customer-to-bank space. The change suggestion is to narrow the EPC SEPA xml format down to those fields that covers the majority of payments in Europe and to make the current ‘recommended-only’ customer-to-bank Implementation Guidelines (C2B IGs) into mandatory IGs.

### 4.5.2 SPS WG analysis and recommendation

With regard to the change request proposal it seems too challenging to harmonise all existing national variations of the C2B implementation Guidelines for the next Rulebook version. Therefore it could be considered that Scheme Participants should accept the C2B messages based on the EPC data set described in its C2B IGs as a minimum requirement. The Scheme Participants still have the possibility to further enrich these C2B messages.

The SPS WG did not propose a concrete recommendation for this change request for the public consultation.

### 4.5.3 Contributions and comments

A majority of EPC Scheme Participants via national banking communities and other contributors to the 2014 public consultation did not support the initial change suggestion. However, it is noted that numerous contributors supported the initial change suggestion. In consideration of the overall comments received, it was concluded that this change suggestion cannot be part of the Scheme. Therefore, the change suggestion has not been included in the SCT Rulebook version 8.0.

However, the EPC will publish the XML Schema Definition (XSD) schemas of the ISO 20022 messages described in the EPC Customer-to-Bank (C2B) Implementation Guidelines (IGs). The EPC Scheme Participants are free to use these EPC C2B XSD schemas.

The topic is also addressed by the Euro Retail Payments Board (ERPB) working group on post-migration issues relating to SCT and SDD<sup>3</sup>.

The following comments were received:

Contributor	Comment Received
<b>STUZZA GmbH on behalf of the Austrian Banking Community</b>	The Austrian Banking Community supports the harmonisation of the pain format in customer to bank interfaces because of growing customer demand.
<b>Spanish banking community</b>	Option e. Enrichment is welcomed, aligned to the SEPA C2B implementation guidelines, since they allow to fit either local/national requirements, different market practices or legal requirements and individual corporates' needs.

<sup>3</sup> On 19 December 2013 the European Central Bank (ECB) announced the launch of the Euro Retail Payments Board (ERPB). The ERPB will “help foster the development of an integrated, innovative and competitive market for retail payments in euro in the EU”. The ERBP includes representatives of both the demand and supply sides of the euro payments market. They are joined by five representatives from the euro area national central banks and one representative from the non-euro area EU national central banks (all on a rotating basis). The ERPB is chaired by the ECB. The European Commission is invited to join as an observer. The EPC is a member of the ERPB. <http://www.ecb.europa.eu/paym/retpaym/governance/eu/html/index.en.html#erpb>.

<b>Contributor</b>	<b>Comment Received</b>
<b>Finnish banking community</b>	This is a real problem, but it is difficult to find an easy solution. In favour.
<b>Irish Payment Services Organisation</b>	We do not support this request as it would require significant IT changes for PSP's and Corporates.
<b>Portuguese banking community</b>	NO. The Portuguese Banking Community agrees that this is too challenging to harmonise all existing national
<b>French Banking Federation</b>	Option e: The main mission of EPC is to design and maintain the SCT Scheme Rulebook for the interbank space. The Customer to Bank space is not governed by EPC.
<b>Luxembourg Bankers' Association (ABBL)</b>	We do not support this change request. There is a need to first understand why there are still differences in the various countries due to legal constraints. Then it's up to a regulatory body to remove these obstacles and to impose the harmonization of the C2B IGs.
<b>BITKOM e.V.</b>	The following compromise made by the SPS WG is acceptable as an initial step. "The Scheme Participants must accept the C2B messages based on the EPC data set described in its SCT IGs as a minimum requirement." This should be incorporated into the scheme as of Nov. 2015. A second step could be the harmonisation of the statements.
<b>Rewe Group</b>	All Subsets, be it national or EPC, need to be upgraded to one single set: ISO2022. Full harmonization over SEPA-countries means a real usefulness for SEPA. 32 different SEPA formats were added while nearly none of the previous national formats have been eliminated. Current Status: more work but no benefit. Harmonization of the current situation is strictly essential.
<b>Deutsche Telekom AG</b>	The following compromise made by the SPS WG is acceptable as an initial step. "The Scheme Participants must accept the C2B messages based on the EPC data set described in its SCT IGs as a minimum requirement." This should be incorporated into the scheme as of Nov. 2015.
<b>Dutch Payments Association (on behalf of Dutch banking community)</b>	Recommendation: Do not change the current situation, where the EPC data set -as described in C2B IG- is the minimum required set.
<b>Febelfin (representing Belgian banking community)</b>	The existing national C2B implementation guidelines are implemented by the majority of clients in each country. It is proposed not to change this. From a standardisation point of view the EPC Implementation guidelines should be seen as a minimum acceptance level for each bank.
<b>German Banking Industry Committee (GBIC) on behalf of the German banking community and Deutsche Bundesbank.</b>	GBIC supports the SPS WG assessment of the change request and proposes to recommend the C2B messages based on the EPC data set as a minimum requirement to be accepted by Scheme Participants (option b). Therefore the EPC should publish the XML Schemes for the pain.-messages (Technical Validation Subsets).
<b>European Payment Institutions Federation (EPIF)</b>	Considering EPC dataset as a minimum requirement is a good recommendation. Participants may have the possibility to further enrich, but should not make this enrichment as mandatory fields.
<b>Hungarian Banking Association</b>	We agree BITKOM's proposal. However, we would like to stress that, according to the SEPA end-date regulation, non-euro area banks are not obliged to receive UNIFI XML batch payment initiation orders before November 2016.



<b>Contributor</b>	<b>Comment Received</b>
<b>Italian banking association (ABI)</b>	SCT Italian participants responding to the consultation think that the harmonising pain format in the customer-to-bank xml interfaces is important to assure an integrated market. Nevertheless at the current stage this proposal has a lot of technical impacts and so they suggest to make further considerations.
<b>Polish banking association</b>	We do not support the proposed solution - option e
<b>UK Payments Council</b>	<p>No consensus position.</p> <p>It would be useful to set the EPC Implementation Guidelines as the mandatory minimum standard on which national variations are built. It would be desirable but unlikely to be achieved due to national differences in the information requested.</p> <p>This matter is wider than just SEPA and is already being addressed in other industry groups such as the CGI. These vehicles should be used to deliver the harmonisations.</p>
<b>Equens SE</b>	<p>According to the CR this should be based on the currently recommended customer-to-bank implementation guidelines, which should be made mandatory. We expect this to limit the current tremendous efforts to support many variants of the SEPA messages for service providers.</p> <p>We propose to adopt the change within a reasonable timespan. We want to be an active part supporting the development of a new standard.</p>
<b>Bank Association of Slovenia</b>	The proposal of BITKOM shall not to be accepted or those changes shall be discussed after the complete implementation of the standard ISO 20022 xml on the EU level. In EU, the standard ISO 20022 XML has not been implemented to the full on the customer-bank level, and changes are being introduced already! We estimate that the proposal of BITKOM arose from the national specificities or specificities of user groups, who are not ready to give up their usual data sets. This change would enable different customers to decide for one subset of the message (either for national version, bank group version or a branch user version). In the case this change is put forward, banks should adapt to these changes. These versions could not be rejected as those rules will be accepted by EPC.
<b>Swiss banking community</b>	EPC data set described in its C2B IG's should considered as a minimum requirement for all participants
<b>Asociación Española de la Economía Digital (Adigital)</b>	Seems reasonable to define a common framework not only for Bank to Bank communications within SEPA. The inclusion of customer to bank framework will facilitate the usage of SEPA environment for merchants.
<b>Ingenico</b>	Ingenico is in favour of harmonisation of xml messages in the C2B space, to the extent that this is actually feasible.
<b>Lithuanian SEPA Coordination Committee</b>	In general we support the idea of harmonising C2B XML messages in the long term.
<b>BSK (Bankenes Standardiseringskontor) Norway</b>	We support that it should be a guiding principle among Scheme Participants that they have to accept the C2B messages based on the EPC data set described in the C2B IG's as a minimum requirement.
<b>Danish Bankers Association</b>	It will ease part of the fragmentation experienced by Debtors initiating payments, but may eliminate the possibility of value added

Contributor	Comment Received
	services. We have not been able to identify the detailed consequences of such actions.
<b>Handelsverband Deutschland (HDE)</b>	<p>The following compromise made by the SPS WG is acceptable as an initial step.</p> <p>""The Scheme Participants must accept the C2B messages based on the EPC data set described in its SCT IGs as a minimum requirement.""</p> <p>This should be incorporated into the scheme as of Nov. 2015.</p> <p>A second step could be the harmonisation of the statements.</p>
<b>AITI - Italian Association of Corporate Treasurers</b>	We would definitely be in favour of harmonization of the C2B (and B2C) space as the current situation of multiple C2B formats and nuances is difficult for end-users. The EPC should take responsibility of tackling the issue and taking things forward, in cooperation with end users.
<b>Nordea Banking Group</b>	It will ease part of the fragmentation experienced by Debtors initiating payments, but may eliminate the possibility of value added services. We have not been able to identify the detailed consequences of such actions.
<b>EACT - European Association of Corporate Treasurers</b>	We would definitely be in favour of harmonization of the C2B (and B2C) space as the current situation of multiple C2B formats and nuances is difficult for end-users. The EPC should take responsibility of tackling the issue and taking things forward, in cooperation with end users.
<b>Citibank NA London Branch</b>	<p>Citi appreciates that the ability to implement such a change by the next iteration of the EPC rulebook is challenging and unlikely. However, we would strongly support such a change in the near future. Such a change would remove or greatly reduce local variants of the pain formats and allow the region to stick to what SEPA was supposed to achieve in the first place - standardised messaging and payment processing throughout the region. The fact is that currently, given the number of different local flavours of pain XML formats, the goal of SEPA standardising payment processing and messaging in Western Europe has not been properly realised to date as local markets look to keep their own nuances.</p> <p>The longer local markets are enabled to set out their own local SEPA flavours, the more divergence will begin to appear in the market and the less standardised SEPA will become.</p>
<b>ASSET (Spanish Association of CFOs)</b>	We would definitely be in favour of harmonization of the C2B (and B2C) space as the current situation of multiple C2B formats and nuances is difficult for end-users. The EPC should take responsibility of tackling the issue and taking things forward, in cooperation with end users, at CSF.



## 4.6 # 64: Make fields “Beneficiary Reference Party” and “Originator Reference Party” more visible

### 4.6.1 Description

This suggestion was made by the Association Française des Trésoriers d’Entreprises.

It is expected that companies will implement centralized payment and collection factories. With such a centralized company issuing SCT on behalf of its subsidiaries; this will mean that the transaction will be initiated from an account of the centralized company but that the ultimate Originator (EPC note: The rulebook term is “Originator Reference Party”) or ultimate Beneficiary (EPC note: The rulebook term is “Beneficiary Reference Party”) will be its subsidiaries.

In such a case, the Beneficiary will not be able to identify the ultimate Originator because its identity is posted in the “ultimate Originator” field (EPC note: “Originator Reference Party”) which is not posted in a visible manner (or vice versa). Only the identity of the account holder, in that case the centralizing company, is posted in a clear manner.

It is suggested to make the field “Ultimate Beneficiary” (EPC note: “Beneficiary Reference Party”) and “Ultimate Originator” (EPC note: “Originator Reference Party”) more visible for the counterparty.

### 4.6.2 SPS WG analysis and recommendation

The SPS WG considered that the change suggestion is already provided for in the Scheme (**option a**). The datasets DS-01 and DS-02 provide the possibility for the Originator to specify the Reference Party details of the Originator and/or of the Beneficiary. Reference is made to the attributes AT-08, 09, 28 and 29.

When the Originator provides these attributes to the Originator Bank, the latter is obliged to transport this information to the Beneficiary Bank.

Subject to an arrangement between the Beneficiary and the Beneficiary Bank, such optional SCT data can be made available.

### 4.6.3 Contributions and comments

The vast majority of EPC Scheme Participants via national banking communities and other contributors to the 2014 public consultation supported the SPS WG recommendation that this suggestion is already provided for in the current Scheme. No changes were therefore needed for the SCT Rulebook version 8.0 in this respect.

The following comments were received:

Contributor	Comment Received
<b>German Banking Industry Committee (GBIC) on behalf of the German banking community and Deutsche Bundesbank.</b>	The EPC should review the SCT Scheme Rulebook if the relevant chapters are precise enough with regard to the SPS WG assessment. A clarification on the transport of the reference party data through the payment chain could be added to the SCT Scheme Rulebook.
<b>Hungarian Banking Association</b>	However we would like to note that the rulebook exempts banks not providing XML statements from the obligation to forward reference party information. This exemption should be temporary and a realistic time period for its elimination should be defined.
<b>Ingenico</b>	The scheme rulebooks already provide everything needed. Now the easy access to those reference party details should be part of the requirements of beneficiary companies towards their Payment Service Providers.
<b>Club SEPA (represents software providers and</b>	Instead of using the word “is obliged” it would be clearer to write “mandatory”. Such information is very important for the process “on behalf of”.

<b>Contributor</b>	<b>Comment Received</b>
<b>consultants involved in SEPA project in France)</b> <a href="http://www.clubsepa.eu/les-membres-du-club/">http://www.clubsepa.eu/les-membres-du-club/</a>	
<b>AITI - Italian Association of Corporate Treasurers</b>	We support the suggestion made by AFTE. It is of utmost importance that the scheme ensures that the details of the ultimate originator / beneficiary are always communicated throughout the payment chain. The attributes should be made mandatory in DS-04 (if present in DS-01, DS-02).
<b>EACT - European Association of Corporate Treasurers</b>	We support the suggestion made by AFTE. It is of utmost importance that the scheme ensures that the details of the ultimate originator / beneficiary are always communicated throughout the payment chain. The attributes should be made mandatory in DS-04 (if present in DS-01, DS-02).
<b>Citibank NA London Branch</b>	Agreed, ultimate creditor/debtor is already supported and should be passed on. This is more of a question of other banks enriching their statements enough to pass these fields on.
<b>ASSET (Spanish Association of CFOs)</b>	We support the suggestion made by AFTE. It is of utmost importance that the scheme ensures that the details of the ultimate originator / beneficiary are always communicated throughout the payment chain. The attributes should be made mandatory in DS-04 (if present in DS-01, DS-02).

## 4.7 # 67: Expand the reasons for SCT recall with “at the request of the payer” in AT-48 ‘The Recall reason code’

### 4.7.1 Description

This suggestion was made by the Bank Association of Slovenia.

Currently three reasons are made available in attribute (AT)-48 to recall a SCT: duplicate sending, technical problems resulting in erroneous SCTs and fraudulent originated credit transfer.

The contributor suggests expanding the possible reasons for a SCT recall with the reason "at the request of the payer" (which is defined by the ISO code CUST) added in AT-48 of the SCT Rulebook. This would also lead to the addition of the code CUST in the SCT inter-bank Implementation Guidelines (IGs).

### 4.7.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**). Article 66 of the PSD stipulates that the payment service user may not revoke a payment order once it has been received by the payer's payment service provider. Three specific exceptions to the finality of a SCT had been agreed in order to recall a SCT.

In order not to impact the finality of the SCT, the SPS WG recommends not to extend the list of SCT recall reasons. In such cases, the Originator or the Originator Bank can use other channels to request the return of the funds. Furthermore, attribute AT-R2 (‘Identification of the type of party initiating the r-message’) allows to indicate if it is the Originator or the Originator Bank who has requested the recall.

However the Originator Bank is already free to initiate a recall at the request of the Originator limited to the three reason codes described in the Rulebook.

The EPC will monitor the ongoing legislative process of the PSD2 with regard to recalls for necessary adjustments of the Rulebook.

### 4.7.3 Contributions and comments

Views among contributors to the 2014 public consultation representing both the demand and supply sides were mixed. However, in consideration of the overall comments from a majority of EPC Scheme Participants via national banking communities and other contributors received, it was concluded that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
Portuguese banking community	See Item #83
Rewe Group	Exactly due to the reason, that a bank can recall a payment for its customer should make it visible in the process, who ordered the recall of a payment. This doesn't have to impact the finality of the payment, but gives more transparency.
Hungarian Banking Association	The Hungarian banks challenge the EPS SPS WG's view on the appropriateness of AT-R2 for differentiating between the types of initiators. However, we see an opportunity to avoid adopting CUST as a new code and propose doubling the actually used codes such as TECH-TEC1, DUPL-DUP1, FRAD-FRA1 (xxx1 being the customer initiation code).
Asociación Española de la Economía Digital (Adigital)	In the case of SCT this is a measure against abuse, but the same scenario is not covered in SDD as mentioned in CR item 57.
Ingenico	Payment guarantee and finality associated with the SCT is an important feature which should be preserved.

<b>Contributor</b>	<b>Comment Received</b>
<b>Lithuanian SEPA Coordination Committee</b>	We think that the additional reason is needed, however the proposed reason is not informative for the payee's PSP in order to provide appropriate information to the payee. We suggest the reason "CustomerError"
<b>BSK (Bankenes Standardiseringskontor) Norway</b>	See comment on # 70
<b>Danish Bankers Association</b>	<p>The banking industry has a need for this reason code, and consequently the SCT scheme should be able to support it. Even though Art. 66 of the PSD does not give the ordering customer any right to revoke a payment order, he should still have the option to apply for a recall which in the end will depend on the acceptance by the final beneficiary.</p> <p>It is not always acceptable to refer banks to using other channels. Many Scheme Participants have no RMA in place with the Beneficiary Bank which make the recall through other channels difficult or impossible.</p> <p>The SEPA recall is often the most practical channel for recalls, as it follows the same way and uses the same infrastructure as the payment.</p>
<b>AITI - Italian Association of Corporate Treasurers</b>	We support the suggestion since gives to beneficiary proper indication of the reason of the recall request, allowing a better evaluation of the request in order to give the necessary authorization and since the code is already present in ISO tables of codes. We suggest to incorporate it in the scheme (option b)
<b>Nordea Banking Group</b>	<p>We accept the fact that this cannot be a part of the next rulebook change although article 66 of the PSD grant the possibility, via a framework contract, to recall a payment. However we do see the need for an adjustment of the recall process in this sense.</p> <p>Due to the fact that, even though SEPA scheme is considered domestic, the scheme also cater for cross border payments and Recalls/investigations should be a natural part of a scheme open for cross border business for the benefit of the consumers and banks. Utilising and expand the already automatic recall procedure, will enable banks to handle these instances in an automated way instead of the current cumbersome manual handling. In this way all aspects of a transaction including investigations will be handled within the same channel/scheme and consumers and banks would not have to rely on channels outside the scheme to fulfil their needs.</p> <p>Corporates often have close contact with their counterparts and are able to handle these issues and procedures bilaterally. However consumers will have to rely on a professional counterpart, their bank, to assist them in the recall/investigation procedure.</p> <p>We consider this to be important on the way forward in order to satisfy the consumer needs related to the SEPA scheme.</p>
<b>EACT - European Association of Corporate Treasurers</b>	We support the suggestion since gives to beneficiary proper indication of the reason of the recall request, allowing a better evaluation of the request in order to give the necessary authorization and since the code is already present in ISO tables of codes. We suggest to incorporate it in the scheme (option b)
<b>Citibank NA London Branch</b>	Citi does not have an objection to this proposal.

<b>Contributor</b>	<b>Comment Received</b>
	<p>Again, the finality of valid transactions is not at risk. The receiving party has to explicitly approve a recall request before the funds are returned.</p> <p>Further, Citi does not see any reason why a client requested recall should not take place within the XML schema rather than via free form SWIFT</p> <p>Finally, the current rulebook provides that recalls are permitted in instances of 'technical problems resulting in erroneous SCTs'. Citi would recommend making the rulebook more explicit to clarify what is meant by 'technical problems' and under what such scenarios are recalls permitted.</p>
<b>ASSET (Spanish Association of CFOs)</b>	<p>We support the suggestion since gives to beneficiary proper indication of the reason of the recall request, allowing a better evaluation of the request in order to give the necessary authorization and since the code is already present in ISO tables of codes. We suggest to incorporate it in the scheme (option b)</p>

## 4.8 # 70: Expand the reasons for SCT recall with “RequestedByCustomer” in AT-48 ‘The Recall reason code’

### 4.8.1 Description

This suggestion was made by Swedbank.

Currently three reasons are made available in attribute (AT)-48 to recall a SCT: duplicate sending, technical problems resulting in erroneous SCTs and fraudulent originated credit transfer.

The contributor suggests expanding the possible reasons for a SCT recall with reason CUST “RequestedByCustomer” added in AT-48 of the SCT Rulebook.

### 4.8.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**). Article 66 of the PSD stipulates that the payment service user may not revoke a payment order once it has been received by the payer's payment service provider. Three specific exceptions to the finality of a SCT had been agreed in order to recall a SCT.

In order not to impact the finality of the SCT, the SPS WG recommends not to extend the list of SCT recall reasons. In such cases, the Originator or the Originator Bank can use other channels to request the return of the funds. Furthermore, attribute AT-R2 (‘Identification of the type of party initiating the r-message’) allows to indicate if it is the Originator or the Originator Bank who has requested the recall.

However the Originator Bank is already free to initiate a recall at the request of the Originator limited to the three reason codes described in the Rulebook.

The EPC will monitor the ongoing legislative process of the PSD2 with regard to recalls for necessary adjustments of the Rulebook.

### 4.8.3 Contributions and comments

Views among contributors to the 2014 public consultation representing both the demand and supply sides were mixed. However, in consideration of the overall comments from a majority of EPC Scheme Participants via national banking communities and other contributors received, it was concluded that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
Portuguese banking community	See Item #83
Rewe Group	Exactly due to the reason, that a bank can recall a payment for ist customer should make it visible in the process, who ordered the recall of a payment. This doesn't have to impact the finality of the payment, but gives more transparency.
Hungarian Banking Association	The Hungarian banks challenge the EPS SPS WG's view on the appropriateness of AT-R2 for differentiating between the types of initiators. However, we see an opportunity to avoid adopting CUST as a new code and propose doubling the actually used codes such as TECH-TEC1, DUPL-DUP1, FRAD-FRA1 (xxx1 being the customer initiation code).
Asociación Española de la Economía Digital (Adigital)	In the case of SCT this is a measure against abuse, but the same scenario is not covered in SDD as mentioned in CR item 57.
Ingenico	Payment guarantee and finality associated with the SCT is an important feature which should be preserved.

<b>Contributor</b>	<b>Comment Received</b>
<b>Lithuanian SEPA Coordination Committee</b>	We think that the additional reason is needed, however the proposed reason is not informative for the payee's PSP in order to provide appropriate information to the payee. We suggest the reason "CustomerError"
<b>BSK (Bankenes Standardiseringskontor) Norway</b>	We support the SPS WG recommendation, but think that all the SCT Recall related suggestions indicates that there is a need for a change in the rules.
<b>Danish Bankers Association</b>	Please see CR item 67
<b>AITI - Italian Association of Corporate Treasurers</b>	We support the suggestion. See item 67.
<b>Nordea Banking Group</b>	Please see item 67
<b>EACT - European Association of Corporate Treasurers</b>	We support the suggestion. See item 67.
<b>Citibank NA London Branch</b>	<p>Citi does not have an objection to this proposal.</p> <p>Again, the finality of valid transactions is not at risk. The receiving party has to explicitly approve a recall request before the funds are returned.</p> <p>Further, Citi does not see any reason why a client requested recall should not take place within the XML schema rather than via free form SWIFT</p> <p>Finally, the current rulebook provides that recalls are permitted in instances of 'technical problems resulting in erroneous SCTs'. Citi would recommend making the rulebook more explicit to clarify what is meant by 'technical problems' and under what such scenarios are recalls permitted.</p>
<b>ASSET (Spanish Association of CFOs)</b>	We support the suggestion since gives to beneficiary proper indication of the reason of the recall request, allowing a better evaluation of the request in order to give the necessary authorization and since the code is already present in ISO tables of codes. We suggest to incorporate it in the scheme (option b)



## **4.9 # 71: Update of the Rulebook section 5.4 ‘Eligibility for Participation’**

### **4.9.1 Description**

This suggestion was made by the EPC Legal Support Group (LSG).

The suggestion for change covers an update in the category descriptions of Scheme applicants that are deemed automatically to be eligible under Rulebook section 5.4 on eligibility for participation. Among other changes, this suggestion includes banks authorised by the Central Bank of San Marino.

### **4.9.2 SPS WG analysis and recommendation**

The SPS WG recommended that the suggestion should be incorporated into the Scheme (**option b**).

### **4.9.3 Contributions and comments**

The vast majority of EPC Scheme Participants via national banking communities and other contributors to the 2014 public consultation supported the SPS WG recommendation that this suggestion can be part of the Scheme. Therefore, this change suggestion has been included in the SCT Rulebook version 8.0.

The following comments were received:

No specific comments had been raised.



## 4.10 # 73: Standardised interbank process including timelines to handle SCT status inquiries by Originator

### 4.10.1 Description

This suggestion was made by the German Banking Industry Committee.

Originators of SCTs often request the Originator Bank to provide information about the fate/ status of already debited and processed SCTs. This situation might occur when the Beneficiary states that he/she has not received the funds or when the payment has been made to a wrong account. Currently such enquiries are handled outside of the scheme.

The change suggestion is to define in the Rulebook a standardised interbank process including timelines for the provision of a reply for this kind of SCT status inquiry. It further proposes to use specific ISO20022 messages for such inquiries.

### 4.10.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**).

The SPS WG considers that inquiries are not (yet) based on XML messages and Scheme Participants can use other channels to initiate SCT investigations (e.g., specific SWIFT messages).

The SCT investigation activities do provide a wide range of support for the customer and are, unlike SCT transaction and SCT recalls, not part of the SCT Rulebook.

### 4.10.3 Contributions and comments

Views among contributors to the 2014 public consultation representing both the demand and supply sides were mixed. However, in consideration of the overall comments from a majority of EPC Scheme Participants via national banking communities and other contributors received, it was concluded that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
Spanish banking community	System operators (CSMs) could establish business practices / procedures for inquiries but in any case it should remain out of the scope of the rulebook.
BITKOM e.V.	Exception has been added to the rulebook. Investigation is also a very important tool and should be part of the rulebook as well. The E&I standard of SWIFT could be a model. Should be incorporated into the scheme - option b
Rewe Group	The SPS WG opinion shows exactly why it SHOULD be part of the scheme. The current situation within certain countries or with certain banks make it a necessary requirement.
Deutsche Telekom AG	Exception has been added to the rulebook. Investigation is also a very important tool and should be part of the rulebook as well. The E&I standard of SWIFT could be a model. Should be incorporated into the scheme - option b
German Banking Industry Committee (GBIC) on behalf of the German banking community and Deutsche Bundesbank.	GBIC is in favour of the original change request (option b). GBIC is convinced that a common understanding and a single solution for the issue as part of the SCT Scheme Rulebook as described in the change request provided to the EPC is necessary and useful for all Scheme Participants. Similar to the mandate request as part of the refund procedure of the SDD Core Scheme Rulebook the EPC should

Contributor	Comment Received
	provide guidance how a standardised enquiry procedure should look like.
<b>Polish banking association</b>	This kind of solution is needed. Customers often ask on which day the beneficiary's account were credited. Standardised interbank process could lower the cost of such inquiries.
<b>Asociación Española de la Economía Digital (Adigital)</b>	The point is very valid and interesting. It's a shame that currently this requests are out of the xml scope. We suggest to incorporate this inquires somehow.
<b>Ingenico</b>	Although not an easy task, extending the scope of the rulebook to this investigation activities, and therefore harmonising / Standardising those investigations through dedicated XML messages and rules would improve STP and bring global value to the industry. This could remain an optional feature for PSPs in the beginning.
<b>Danish Bankers Association</b>	The banking industry has a need for handing status inquiries. The scheme should support this need and not refer to other channels. For practical reasons it is best that inquiries follow the same path as the original payment, using the same infrastructure. Many banks have no RMA in place with the beneficiary bank which makes the handling of status inquiries through other channels difficult or impossible.
<b>Handelsverband Deutschland (HDE)</b>	Exception has been added to the rulebook. Investigation is also a very important tool and should be part of the rulebook as well. The E&I standard of SWIFT could be a model. Should be incorporated into the scheme - option b
<b>Nordea Banking Group</b>	The banking industry has a need for handing status inquiries. The scheme should support this need and not refer to other channels. For practical reasons it is best that inquiries follow the same path as the original payment, using the same infrastructure. Many banks have no RMA in place with the beneficiary bank which makes the handling of status inquiries through other channels difficult or impossible.
<b>Citibank NA London Branch</b>	The fact that inquiries are conducted outside of the SEPA XML schema has not been an issue for Citi. Further, the fact that there are no interbank guidelines or SLAs for responding to inquiries is no different to the current process for Wire queries.  We would, however, have no objection for these messaging flows to be introduced to the SEPA XML schema in the future.

## 4.11 # 80: Attribute 45 'Category purpose of the credit transfer' (AT-45) to be mandatory instead of optional

### 4.11.1 Description

This suggestion was made by the Portuguese banking community.

The contributor suggests turning the optional attribute 'category purpose of the credit transfer' (AT-45) into a mandatory field. This would help the Originator Bank and Beneficiary Bank to identify the payment reason of a SCT allowing the Originator Bank and Beneficiary Bank to apply special processing rules for SCT categories (e.g., salaries, taxes, pensions).

### 4.11.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**). Depending on the agreement between the Originator and the Originator Bank, the category purpose can be forwarded to the Beneficiary Bank and the Beneficiary subject to any overriding legal/ regulatory requirements. The SPS WG refers to the rules applied in datasets DS-01 and DS-02 and recommends that this attribute remains optional.

### 4.11.3 Contributions and comments

The vast majority of EPC Scheme Participants via national banking communities and other contributors to the 2014 public consultation supported the SPS WG recommendation that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
Spanish banking community	option b
UK Payments Council	At this point making the change mandatory would be premature. However, requests to report on the purpose of payment is a growing requirement and Payments Council feel that a watching brief should be maintained to assess any business issues that arise.
Equens SE	Should be mandatory. In this case, correspondence to German "DTA Textschlüssel" could be made.
Ingenico	Our opinion is rather that the rule should be to make this field mandatory and circulated end to end in order to improve automated processes at beneficiary's level. The scheme should allow for values such as "Not provided" or "Not forwarded for regulatory reasons" though, to take into account that not all originators are currently in a position to feed that field correctly
Citibank NA London Branch	Citi has no major issue with this field remaining optional. We advise clients the importance of using this field - particularly when this is related to Payroll (codeword SALA). This should be best practice for other banks also.

## 4.12 # 81: Attribute 21 'Name of the Beneficiary' of the credit transfer (AT-21) to be optional instead of mandatory

### 4.12.1 Description

This suggestion was made by the Portuguese banking community.

The contributor suggests turning the mandatory attribute 'Name of the Beneficiary' into an optional attribute. The change suggestion emphasizes that the IBAN and BIC are mandatory, the transaction validation includes the plausibility check of the IBAN of the Beneficiary and the IBAN is considered as a unique identifier.

### 4.12.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**).

The name of the Beneficiary is generally available and is helpful in the handling of SCT recalls. It is recommended to keep the name of the Beneficiary as a mandatory element.

### 4.12.3 Contributions and comments

The vast majority of EPC Scheme Participants via national banking communities and other contributors to the 2014 public consultation supported the SPS WG recommendation that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
<b>Finnish banking community</b>	Name is important e.g. in AML screening
<b>Rewe Group</b>	The name can only be mandatory, if it is also in ISO2022. At the moment, the name has no relevance when making a payment - PSPs do not have to validate the beneficiary's name with the bank account owner's name. This way, the name has no meaning for the transaction.
<b>UK Payments Council</b>	This is subject to the EPC ensuring compliance with relevant legislation in this area e.g. FATF Recommendation 16/the Funds Transfer Regulation.
<b>BSK (Bankenes Standardiseringskontor) Norway</b>	The name of the beneficiary has to be mandatory due to anti-laundering rule and FATF rules. As well it happens that the name of the beneficiary is different to the name of the payee's account, then the Beneficiary name clearly has to follow the transaction.
<b>Citibank NA London Branch</b>	Citi would agree with this proposal. Further, name of bene is used as part of sanctions validations. Moving this field to optional could throw up issues where txns are passed along which should have been flagged as a sanctions hit.

## 4.13 # 82: Extend time window to launch a SCT recall request from 10 to 20 Banking Business days

### 4.13.1 Description

This suggestion was made by the Portuguese banking community.

The Rulebook prescribes in CT-02.01 of section 4.3.2 that the Originator Bank must check if the SCT had an execution date towards the CSM of less than 10 Banking Business Days to determine if the Originator Bank can actually initiate a SCT recall request. The suggestion is to increase this maximum period from 10 to 20 Banking Business Days.

### 4.13.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**) to extend the current permitted timespan of 10 Banking Business Days for the initiation of a SCT recall request. Extending this timespan will have an impact on the finality of the SCT. Furthermore, the SCT recall procedure has been put in place for three specific reasons only.

After 10 Banking Business Days, the Originator/ Originator Bank should use another channel outside the Scheme to try to reclaim the funds from the Beneficiary Bank/ Beneficiary for any erroneous, duplicate or fraudulent SCT.

### 4.13.3 Contributions and comments

The vast majority of EPC Scheme Participants via national banking communities and other contributors to the 2014 public consultation supported the SPS WG recommendation that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
<b>Shahid Ali - Business Analyst</b>	But a correlation or point of reference how 10 days as standard is originated or be added. Not aware PSD has such time line. In case it is EPC then mention somewhere atleast it is not PSD.
<b>Febelfin (representing Belgian banking community)</b>	The Recall procedure can be extended with the advice to react asap to have an optimal recuperation possibility. Contacting the impacted banks would take a lot of time and automatic Recall processing can be guaranteed with longer time period. Limitation on max 20-30 days is advised.
<b>Hungarian Banking Association</b>	See our comment under item 15. Our community proposes 30 calendar days especially with regard to customer initiated SCT recalls. The use of non SEPA messages hinders smooth transaction processing and the integrity of the scheme which we would like to avoid.
<b>Danish Bankers Association</b>	See comments on item 14
<b>Nordea Banking Group</b>	See item 14 above.
<b>Citibank NA London Branch</b>	see comments for #15

#### 4.14 # 83: Expand the reasons for SCT recall with “ordering request (undue payment)” in AT-48 ‘The Recall reason code’

##### 4.14.1 Description

This suggestion was made by the Portuguese banking community.

Currently three reasons are made available in attribute (AT)-48 to recall a SCT: duplicate sending, technical problems resulting in erroneous SCTs and fraudulent originated credit transfer.

The contributor suggests expanding the possible reasons for a SCT recall with “ordering request (undue payment)” added in AT-48 of the SCT Rulebook.

##### 4.14.2 SPS WG analysis and recommendation

The SPS WG recommended not taking forward the suggestion for change (**option e**). Article 66 of the PSD stipulates that the payment service user may not revoke a payment order once it has been received by the payer's payment service provider. Three specific exceptions to the finality of a SCT had been agreed in order to recall a SCT.

In order not to impact the finality of the SCT, the SPS WG recommends not to extend the list of SCT recall reasons. In such cases, the Originator or the Originator Bank can use other channels to request the return of the funds. Furthermore, attribute AT-R2 (‘Identification of the type of party initiating the r-message’) allows to indicate if it is the Originator or the Originator Bank who has requested the recall.

However the Originator Bank is already free to initiate a recall at the request of the Originator limited to the three reason codes described in the Rulebook.

The EPC will monitor the ongoing legislative process of the PSD2 with regard to recalls for necessary adjustments of the Rulebook.

##### 4.14.3 Contributions and comments

Views among contributors to the 2014 public consultation representing both the demand and supply sides were mixed. However, in consideration of the overall comments from a majority of EPC Scheme Participants via national banking communities and other contributors received, it was concluded that this suggestion cannot be part of the Scheme. Therefore, this change suggestion has not been included in the SCT Rulebook version 8.0.

The following comments were received:

Contributor	Comment Received
<b>Hungarian Banking Association</b>	The Hungarian banks challenge the EPS SPS WG's view on the appropriateness of AT-R2 for differentiating between the types of initiators. However, we see an opportunity to avoid adopting CUST as a new code and propose doubling the actually used codes such as TECH-TEC1, DUPL-DUP1, FRAD-FRA1 (xxx1 being the customer initiation code)
<b>UK Payments Council</b>	Agree that EPC should monitor the ongoing legislative process of PSD2.
<b>Ingenico</b>	Payment guarantee and finality associated with the SCT is an important feature which should be preserved.
<b>AITI - Italian Association of Corporate Treasurers</b>	We support the suggestion. See item 67.
<b>EACT - European Association of Corporate Treasurers</b>	"We support the initial suggestion. See item 67.
<b>Citibank NA London Branch</b>	see comments for #67



<b>Contributor</b>	<b>Comment Received</b>
<b>ASSET (Spanish Association of CFOs)</b>	We support the suggestion. See item 67.



## **5 Changes pertaining to the impact of the SEPA Regulation or of any other EU Legislation**

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

For this release management cycle, no changes were deemed required.



## Annex I

Responses were received from the following contributors.

Input from:	List of contributors
<b>Banking communities or individual banks</b>	<ol style="list-style-type: none"> <li>1. Bank Association of Slovenia</li> <li>2. BSK (Bankenes Standardiseringskontor) Norway</li> <li>3. Citibank NA London Branch</li> <li>4. Danish Bankers Association</li> <li>5. Dutch Payments Association (on behalf of Dutch banking community)</li> <li>6. European Payment Institutions Federation (EPIF)</li> <li>7. Febelfin (representing Belgian banking community)</li> <li>8. Finnish banking community</li> <li>9. French Banking Federation</li> <li>10. German Banking Industry Committee (GBIC) on behalf of the German banking community and Deutsche Bundesbank</li> <li>11. Hungarian Banking Association</li> <li>12. Irish Payment Services Organization</li> <li>13. Italian Banking Association (ABI)</li> <li>14. Luxembourg Bankers' Association (ABBL)</li> <li>15. Nordea Banking Group</li> <li>16. Polish Banking Association</li> <li>17. Portuguese banking community</li> <li>18. Spanish banking community</li> <li>19. STUZZA GmbH on behalf of the Austrian Banking Community</li> <li>20. Swiss banking community</li> <li>21. UK Payments Council</li> </ol>
<b>Other stakeholders</b>	<ol style="list-style-type: none"> <li>1. AITI - Italian Association of Corporate Treasurers</li> <li>2. Asociación Española de l'Economía Digital (Adigital)</li> <li>3. ASSET (Spanish Association of CFOs)</li> <li>4. BITKOM e.V.</li> <li>5. Club SEPA (represents software providers and consultants involved in SEPA project in France)</li> <li>6. Deutsche Telekom AG</li> <li>7. EACT - European Association of Corporate Treasurers</li> <li>8. Equens SE</li> <li>9. Handelsverband Deutschland (HDE)</li> <li>10. Ingenico</li> <li>11. Lithuanian SEPA Coordination Committee</li> <li>12. Rewe Group</li> <li>13. RXPAY</li> <li>14. Shahid Ali</li> </ol>