

**CHANGE PROPOSAL SUBMISSION DOCUMENT
FOLLOWING THE 2018 PUBLIC CONSULTATION
ON SCT CHANGE REQUESTS**

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 SCT rulebook to take effect in 17 November 2019.
Reason for Issue	Feedback to all stakeholders on the results of the 2018 public consultation
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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 standardisation bodies, such as the International Organization for Standardization (ISO).

The principles governing the evolution of the SEPA schemes are set out in section three of the [SEPA Scheme Management Internal Rules](#) (SMIRs).

1.1. EPC rulebook release management - important notice to all SEPA stakeholders

The EPC publishes updated versions of the rulebooks at a minimum every two year in the month of November. In accordance with industry best practice, payment service providers (PSPs) and their suppliers therefore have sufficient lead time to address rulebook updates prior to such changes taking effect.

The 2019 versions of the SCT and SDD rulebooks will be published on 20 November 2018. Based on the established release management cycle, these versions will take effect on 17 November 2019 (SWIFT 2019 Standards Release live date).

1.2. SEPA payment scheme development: EPC scheme change management

The first step in the EPC scheme change management cycle is the **introduction of change requests** to the schemes by any interested party.

In consideration of the change requests received, the EPC Scheme Evolution and Maintenance Working Group (SEMWWG) develops a **public consultation document**, containing the change requests and the related SEMWWG recommendations, per EPC SEPA scheme rulebook.

The preparation of the public consultation documents involves the analysis of the change requests received which may include, as appropriate, an impact analysis. Based on this analysis, the SEMWWG issues a recommendation on how each change request should be handled.

All submitted change requests to modify the rulebooks received by the EPC are published through the public consultation documents on the EPC Website, permitting such a list to be openly viewed by all stakeholders. The public consultation documents are released for a **three-month public consultation** in the second quarter of the year.

From the moment the three-month public consultation has ended, the SEMWWG shall collect and consolidate the comments received from all EPC SEPA scheme participants and stakeholders during the public consultation. The SEMWWG then analyses the expressed support and the comments received for each change request. After that, it develops **change proposals** based on the level of support and comments received from the public consultation.

A change proposal as developed by the SEMWWG may bring together more than one change, developed from one or more change requests.

The SEMWWG consolidates the change proposals, along with each change request and the related comments received from the contributors during the public consultation, in the **change proposal submission document**.



The change proposal submission document is then submitted to the **EPC Scheme Management Board (SMB)**, the **Scheme End-User Forum (SEUF)** and the **EPC Scheme Technical Forum (ESTF)**.

The roles of the SEUF and the ESTF are described in section 4.4 of the SMIRs. The SEUF and the ESTF formulate their respective positions and address them to the SMB. The SMB will have its final decision-making deliberations in accordance with section 4.2.5 of the SMIRs.



2. EXECUTIVE SUMMARY

This Change Proposal Submission Document (EPC 122-18) describes that each stage of the 2018 SCT rulebook change management cycle, from the initiation to the public consultation, has been properly completed in respect of each change request submitted.

The first step in the change management cycle has been the **introduction of change requests** to the SCT scheme by any interested party. Deadline for receipt of such suggestions was 31 December 2017. The EPC received **25** change requests for major changes to be introduced into the SCT rulebook.

The public consultation on possible modifications to be introduced into the 2019 SCT rulebook to take effect in 17 November 2019 ran from 13 March until 10 June 2018.

The documents circulated for the public consultation were the document SCT Rulebook 2018 Change Request Public Consultation Document (EPC 005-18) and the Response Template (EPC 009-18). Both documents have been made available on the [EPC Website](#).

This Change Proposal Submission Document contains for each change request:

- a) A summary of the change request;
- b) The SEMWG analysis and the recommendation given for the public consultation;
- c) The comments received during the public consultation;
- d) The SEMWG change proposal submitted to the SMB, the SEUF and the ESTF for their consideration;
- e) The SMB decision on each SEMWG change proposal.

The SMB took into account the position documents **EPC 146-18** and **EPC 145-18** from the SEUF and the ESTF respectively when making its decision on each change request and related SEMWG change proposal.

As a result of the 2018 SCT rulebook change management process, the SCT rulebook has been updated to include

- A separate annex (Annex V) as a formal rulebook **option** in the SCT rulebook facilitating the transmission of multiple occurrences of structured remittance information per single SCT transaction (Extended Remittance Information option);
- A clarification on the obligation for the participants to comply with the mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs);
- A SCT transaction containing an IBAN but not the related BIC can be transmitted by the Originator to the Originator Bank, even if one of the two SCT scheme participants mentioned in that transaction is based in a non-EEA SEPA country;
- Inclusion of additional SCT r-transaction reason codes related to clearing and settlement-specific issues i.e. ED05 and CNOR;
- Inclusion of usage rules in the SCT C2B IGs on how a Beneficiary can make a 'Repayment' to transfer back funds to the Originator;
- Several changes to the existing SCT Recall and Request for Recall by the Originator (RFRO) procedures;



- Extra reasons for the response to a SCT inquiry.

Overview of the 2018 change requests and the final SMB decision

Item	Change request title	SMB decision
1	Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	For inclusion in the 2019 SCT Rulebook version 1.0.
2	Changes to the Recall procedure	For inclusion in the 2019 SCT Rulebook version 1.0.
3	Changes to the 'Request for Recall by the Originator' (RFRO) procedure	For inclusion in the 2019 SCT Rulebook version 1.0.
7	Extra reasons for the response to a SCT Inquiry	For inclusion in the 2019 SCT Rulebook version 1.0.
8	Editorial restructuring of the rulebook sections on SCT rulebook processing flows	For inclusion in the 2019 SCT Rulebook version 1.0.
9	Inclusion of Extended Remittance Information (ERI) option	For inclusion as an option (option c) within the scheme in the 2019 SCT Rulebook version 1.0.
10	Change request withdrawn	Not applicable.
11	Change request withdrawn	Not applicable.
15	Mandatory use of the acmt.022 message in the interbank space	Not to be included in the 2019 SCT Rulebook version 1.0.
17	Addition of a Repayment service	Not to be included in the 2019 SCT Rulebook version 1.0.
18	Extension response deadline for Beneficiary Banks to a Request for Recall by the Originator (RFRO)	For inclusion in the 2019 SCT Rulebook version 1.0.
19	Possibility for the Originator to request Beneficiary details following a negative answer to a Request for Recall by the Originator	Not to be included in the 2019 SCT Rulebook version 1.0.
25	SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries	For inclusion in the 2019 SCT Rulebook version 1.0.
27	Inclusion of incoming One-Leg Out euro credit transfers	Not to be included in the 2019 SCT Rulebook version 1.0.
28	Inclusion of R-transaction reason code ED05	For inclusion in the 2019 SCT Rulebook version 1.0.



Item	Change request title	SMB decision
29	inclusion of R-transaction reason code CNOR	For inclusion in the 2019 SCT Rulebook version 1.0.
32	Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs	Not to be included in the 2019 SCT Rulebook version 1.0.
35	Extension of the period for the Originator Bank to submit a Recall request	Not to be included in the 2019 SCT Rulebook version 1.0.
37	Extended Remittance Information option to deliver extended structured remittance information to the Beneficiary	Not to be included in the 2019 SCT Rulebook version 1.0. The SMB refers to its decision taken for change request #09.
38	Amendment in business requirements for Attribute AT-05 - The Remittance Information	Not to be included in the 2019 SCT Rulebook version 1.0. The SMB refers to its decision taken for change request #09.
39	Option to allow contemporaneous presence of unstructured and structured remittance information	Not to be included in the 2019 SCT Rulebook version 1.0. The SMB refers to its decision taken for change request #09.
40	Increase the space for the unstructured remittance information	Not to be included in the 2019 SCT Rulebook version 1.0.
41	Increase the space for the structured remittance information	Not to be included in the 2019 SCT Rulebook version 1.0. The SMB refers to its decision taken for change request #09.
42	Allow Originator Bank adhered to the Extended Remittance Information option to send both structured and unstructured information to the Beneficiary Bank adhered to the option	Not to be included in the 2019 SCT Rulebook version 1.0. The SMB refers to its decision taken for change request #09.
43	Allow Beneficiary Bank adhered to the Extended Remittance Information option to send both structured and unstructured information to the Beneficiary	Not to be included in the 2019 SCT Rulebook version 1.0. The SMB refers to its decision taken for change request #09.



3. OVERVIEW OF CHANGE REQUESTS SUBMITTED FOR THE 2018 PUBLIC CONSULTATION

All change requests to the SCT rulebook were reviewed by the SEMWG.

This section lists the change requests which were presented for public consultation along with the recommendation given by the SEMWG for each change request.

3.1. Possible recommendations for a change request

Each recommendation reflects one of the options detailed in points a) through f) below:

- a) The change request is **already provided for** in the scheme: no action is necessary for the EPC.
- b) The change request **should be incorporated into the scheme**: the change request becomes part of the scheme and the rulebook is amended accordingly.
- c) The change request **should be included in the scheme** as an **optional feature**:
 - The new feature is optional and the rulebook will be amended accordingly;
 - Each scheme participant¹ may decide to offer the feature to its customers, or not.
- d) The change request **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 change request **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 Regulation² or any other relevant EU legislation.
- f) The change request may be considered for the development of a **new scheme**:
 - The change request reflects major changes which cannot be integrated into an existing scheme;
 - To develop the change request further, i.e. to develop a new scheme, the following requirements should be met:
 - The benefits of the new scheme for payment end users are demonstrated prior to the launch of the development phase;
 - It is demonstrated that a sufficient number of stakeholders will make use of the new scheme;
 - A cost-benefit analysis is provided;

¹ A scheme participant is a PSP which has formally adhered to a SEPA scheme

² 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 complies with the SEPA Regulation or any other relevant regulation.

3.2. Summary of change requests and the expressed support following the public consultation

The two tables below express the level of support from the contributors to the EPC SEMWG recommendations presented during the public consultation. The list of contributors can be found in Annex I at the end of this document.

The tables summarise the responses from the (national communities of) scheme participants and the other contributors respectively for each change request. The contributors were requested to indicate in the response template if they support the SEMWG recommendation (“Yes”) or not (“No”). They also had the choice to express no position on the change request or on the SEMWG recommendation (“No Opinion”). **The number of “No Opinion” positions have not been taken into account when determining the level of support for each change request.**

For a few change requests, the SEMWG did not formulate a concrete recommendation. Instead the contributors were asked to express their comments. We refer to the section “Explicit public consultation comments received” for each concerned change request under section 4 of this document to know the concrete position from the contributors.

Please note that contributors may have expressed a “Yes”, a “No” or a “No Opinion” position without having provided further comments. The section “Explicit public consultation comments received” for each change request under section 4 will only report the explicit comments received from each contributor but not the “Yes”, a “No” or a “No Opinion” position itself of that contributor.



Table 1 Scheme participants: summary of change requests and the support expressed during the public consultation

Item	Change request title	Topic	EPC SEMWG recommendation	Count "Yes"	Count "No"	Count "No Opinion"
1	Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	Implementation Guidelines	Inclusion into the scheme (option b) as of Nov 2019	17	1	1
2	Changes to the Recall procedure	Recall procedure	Inclusion into the scheme (option b) as of Nov 2019	16	0	3
3	Changes to the 'Request for Recall by the Originator' (RFRO) procedure	RFRO procedure	Inclusion into the scheme (option b) as of Nov 2019	16	0	3
7	Extra reasons for the response to a SCT Inquiry	SCT Inquiries	Inclusion into the scheme (option b) as of Nov 2019	17	0	2
8	Editorial restructuring of the rulebook sections on SCT rulebook processing flows	Editorial change only	Inclusion into the scheme (option b) as of Nov 2019	18	0	1
9	Inclusion of Extended Remittance Information (ERI) option	Extended Remittance Information (ERI)	Inclusion as an option in the scheme (option c) as of Nov 2019	11	7	1
10	This change request has been withdrawn.	Withdrawn		N/A	N/A	N/A
11	This change request has been withdrawn.	Withdrawn		N/A	N/A	N/A
15	Mandatory use of the acmt.022 message in the interbank space	Account management messages	Cannot be part of the existing scheme – option e	16	1	2
17	Addition of a Repayment service	Repayment (SCT schemes)	Inclusion into the scheme (option b) as of Nov 2019	11	6	2
18	Extension response deadline for Beneficiary Banks to a Request for Recall by the Originator (RFRO)	RFRO procedure	Inclusion into the scheme (option b) as of Nov 2019	Item a): 14 Item b): 15	Item a): 4 Item b): 4	Item a): 1 Item b): 0
19	Possibility for the Originator to request Beneficiary details following a negative answer to a Request for Recall by the Originator (RFRO)	RFRO procedure	Cannot be part of the existing scheme – option e	Item a): 13 Item b): 13	Item a): 3 Item b): 3	Item a): 3 Item b): 3
25	SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries	IBAN-Only for non-EEA SEPA countries	Inclusion into the scheme (option b) as of Nov 2019	16	1	2
27	Inclusion of incoming One-Leg Out euro credit transfers	One-Leg Out transactions	Cannot be part of the existing scheme – option e	16	1	2
28	Inclusion of R-transaction reason code ED05	R-transaction	Inclusion into the scheme (option b) as of Nov 2019	15	1	3
29	inclusion of R-transaction reason code CNOR	R-transaction	Inclusion into the scheme (option b) as of Nov 2019	15	1	3
32	Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs	Interbank IGs: responsibility for usage rule execution	Cannot be part of the existing scheme – option e	16	1	2
35	Extension of the period for the Originator Bank to submit a Recall request	Recall procedure	Cannot be part of the existing scheme – option e	13	3	3
37	Extended Remittance Information option to deliver extended structured remittance information to the Beneficiary	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	6	11	2
38	Amendment in business requirements for Attribute AT-05 - The Remittance Information	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	6	11	2
39	Option to allow contemporaneous presence of unstructured and structured remittance information	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	5	12	2
40	Increase the space for the unstructured remittance information	Extended Remittance Information (ERI)	Cannot be part of the existing scheme – option e	15	3	1
41	Increase the space for the structured remittance information	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	5	11	3
42	Allow Originator Bank adhered to the Extended Remittance Information option to send both structured and unstructured information to the Beneficiary Bank adhered to the option	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	6	11	2
43	Allow Beneficiary Bank adhered to the Extended Remittance Information option to send both structured and unstructured information to the Beneficiary	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	6	11	2



Table 2 **Other contributors**: summary of change requests and the support expressed during the public consultation

Item	Change request title	Topic	EPC SEMWG recommendation	Count "Yes"	Count "No"	Count "No Opinion"
1	Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	Implementation Guidelines	Inclusion into the scheme (option b) as of Nov 2019	4	0	21
2	Changes to the Recall procedure	Recall procedure	Inclusion into the scheme (option b) as of Nov 2019	5	0	20
3	Changes to the 'Request for Recall by the Originator' (RFRO) procedure	RFRO procedure	Inclusion into the scheme (option b) as of Nov 2019	5	0	20
7	Extra reasons for the response to a SCT Inquiry	SCT Inquiries	Inclusion into the scheme (option b) as of Nov 2019	5	0	20
8	Editorial restructuring of the rulebook sections on SCT rulebook processing flows	Editorial change only	Inclusion into the scheme (option b) as of Nov 2019	4	0	21
9	Inclusion of Extended Remittance Information (ERI) option	Extended Remittance Information (ERI)	Inclusion as an option in the scheme (option c) as of Nov 2019	24	0	1
10	This change request has been withdrawn.	Withdrawn		N/A	N/A	N/A
11	This change request has been withdrawn.	Withdrawn		N/A	N/A	N/A
15	Mandatory use of the acmt.022 message in the interbank space	Account management messages	Cannot be part of the existing scheme – option e	4	0	21
17	Addition of a Repayment service	Repayment (SCT schemes)	Inclusion into the scheme (option b) as of Nov 2019	4	0	21
18	Extension response deadline for Beneficiary Banks to a Request for Recall by the Originator (RFRO)	RFRO procedure	Inclusion into the scheme (option b) as of Nov 2019	Item a): 5 Item b): 5	Item a): 0 Item b): 0	Item a): 20 Item b): 20
19	Possibility for the Originator to request Beneficiary details following a negative answer to a Request for Recall by the Originator (RFRO)	RFRO procedure	Cannot be part of the existing scheme – option e	Item a): 2 Item b): 2	Item a): 3 Item b): 3	Item a): 20 Item b): 20
25	SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries	IBAN-Only for non-EEA SEPA countries	Inclusion into the scheme (option b) as of Nov 2019	6	0	19
27	Inclusion of incoming One-Leg Out euro credit transfers	One-Leg Out transactions	Cannot be part of the existing scheme – option e	4	0	21
28	Inclusion of R-transaction reason code ED05	R-transaction	Inclusion into the scheme (option b) as of Nov 2019	4	0	21
29	inclusion of R-transaction reason code CNOR	R-transaction	Inclusion into the scheme (option b) as of Nov 2019	4	0	21
32	Clear validation responsibilities to participants and CSMS to execute the SEPA Usage Rules in the interbank IGs	Interbank IGs: responsibility for usage rule execution	Cannot be part of the existing scheme – option e	0	1	24
35	Extension of the period for the Originator Bank to submit a Recall request	Recall procedure	Cannot be part of the existing scheme – option e	4	0	21
37	Extended Remittance Information option to deliver extended structured remittance information to the Beneficiary	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	23	0	2
38	Amendment in business requirements for Attribute AT-05 - The Remittance Information	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	23	0	2
39	Option to allow contemporaneous presence of unstructured and structured remittance information	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	23	0	2
40	Increase the space for the unstructured remittance information	Extended Remittance Information (ERI)	Cannot be part of the existing scheme – option e	1	23	1
41	Increase the space for the structured remittance information	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	23	0	2
42	Allow Originator Bank adhered to the Extended Remittance Information option to send both structured and unstructured information to the Beneficiary Bank adhered to the option	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	23	0	2
43	Allow Beneficiary Bank adhered to the Extended Remittance Information option to send both structured and unstructured information to the Beneficiary	Extended Remittance Information (ERI)	No SEMWG recommendation – see change request # 09	23	0	2



3.3. Summary of changes for inclusion in the next version of the SCT rulebook to be aligned with the SEPA Regulation or with any other relevant EU legislation

Ref.	Topic	Contributor	Way forward
	No change items were identified at the time of the start of the public consultation that required a change to the rulebook due to any particular EU legislation. An overview of the regulatory changes is available in Chapter 5 of this document.		



4. MAJOR CHANGE REQUESTS DETAILS, THE RELATED PUBLIC CONSULTATION COMMENTS AND SEMWG CHANGE PROPOSAL

4.1. # 1: Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)

4.1.1. Description

This change request was made by the SEMWG.

As of the version 1.0 of the 2017 rulebooks, the SCT and SDD scheme participants are obliged to accept at least but not exclusively Customer-to-Bank (C2B) SEPA payment message files based on the EPC's C2B Implementation Guidelines (IGs) defined for all four schemes.

However, there are scheme participants in the role of Originator Bank or Creditor Bank that do not offer at all the service of accepting and processing ISO 20022 XML message– based electronic bulk files of SCT instructions/ SDD collections for their Originators and Creditors.

An example is consumer-only oriented SCT participants or SDD scheme participants handling small volumes of SDD collections. The concerned consumers and professionals enter the SCT instructions and SDD collections respectively directly in the online banking portals of these scheme participants.

The SEMWG believes these EPC scheme participants should not be obliged to invest in tools to handle ISO 20022 XML message– based electronic C2B bulk payment files if none of their customers will ever use such method of transmitting SCT instructions/ SDD collections.

The change request proposes rewording in some very specific rulebook sections to reflect this reality. It clarifies which Originator Banks and Creditor Banks must comply with the mandatory C2B IGs of the respective EPC schemes.

4.1.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2019**.

4.1.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2019 SCT Rulebook version 1.0.



Explicit public consultation comments received

Contributor	Comments received
European Association of Corporate Treasurers (EACT)	Yes - We agree with the principle that EPC scheme participants should not be obliged to invest in tools to handle ISO 20022 XML message– based electronic C2B bulk payment files they do not offer electronic interfaces for sending single SCT instructions/ SDD collections or bulk files with multiple payment SCT instructions/ SDD collections. WE suggest anyway to carefully analyse the impact of PSD2 and that rewording for the concerned rulebook sections will have to be carefully chosen in order to align them with the PSD2 legal framework.
Italian Association of Corporate Treasurers (AITI)	Yes - AITI considers reasonable that EPC scheme participants should not be obliged to invest in tools to handle ISO 20022 XML message– based electronic C2B bulk payment files if they do not offer electronic interfaces for sending single SCT instructions/ SDD collections or bulk files with multiple payment SCT instructions/ SDD collections. AITI suggests anyway evaluate this topic in the light of the regulatory framework defined by PSD 2, and suggests to reword the concerned rulebook sections carefully in order to align them with the PSD2 legal framework.

4.1.4. SMB decision

For inclusion in the 2019 SCT rulebook.



4.2. # 2: Changes to the Recall procedure

4.2.1. Description

This change request was made by the SEMWG.

It highlights several issues which have been reported with respect to the SCT Recall procedure. Where applicable, these issues may also occur for Recalls made under the SCT Inst scheme.

It proposes concrete changes in both SCT rulebooks to resolve such issues and to harmonize as best as possible the Recall process description in both SCT rulebooks.

It further suggests including the possibility for a Request for Status Update in the Recall process of both SCT rulebooks. The feature is already included in the 'Request for a Recall by the Originator' (RFRO) process of both SCT rulebooks. It will be of further assistance to the Originator Bank to the benefit of the Originator in the exceptional case the Originator Bank has not received any response from the Beneficiary Bank after the Recall response deadline defined in both SCT rulebooks.

4.2.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2019**.

4.2.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
French Banking Federation	Yes - The addition of the status update message is in line with what have been done for RFRO and Inquiries messages.
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	Yes - It should be clarified in the RB that the Request for Status Update (AT-48) is part of a different message. (Similar clarification is needed for RFRO and Inquiry messages.) Remark: We propose to delete the restriction to one transaction per bulk message pacs.028 in the Request for Status Update (context SCT Recalls and SCT Inquiries).



4.2.4. SMB decision

For inclusion in the 2019 SCT rulebook.



4.3. # 3: Changes to the 'Request for Recall by the Originator' (RFRO) procedure

4.3.1. Description

This change request was made by the SEMWG.

In analogy with the change request item # 02, the SEMWG reviewed the 'Request for Recall by the Originator' (RFRO) procedure considering that the following issues may occur although the rulebook requires either a positive or a negative response (note: the RFRO procedure becomes effective as of November 2018 only under both SCT schemes):

- The Beneficiary Bank does not respond to the RFRO request from the Originator Bank within the deadline defined in the SCT rulebooks because the Beneficiary Bank may have contacted the Beneficiary but did not receive a reply from the Beneficiary.
- The Beneficiary Bank may not reply with the appropriate positive message (pacs.004) but with a "ordinary" transfer message (pacs.008) which can cause reconciliation problems on the side of the Originator Bank

The SEMWG proposes concrete changes in both SCT rulebooks to prevent such issues and to harmonize as best as possible the RFRO process description in both SCT rulebooks.

Another change is to adapt the 'Remarks' section of the DS-07 'Request for Recall by the Originator Dataset' (SCT rulebook) and the DS-08 'Request for Recall by the Originator Dataset' (SCT Inst rulebook).

The final part of the change request is to extend the list of reasons for non-acceptance of the Request for Recall by the Originator compared to the list of reasons possible under the standard Recall procedure.

4.3.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2019**.

4.3.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
UK Finance	YES – UK community believe further work should be undertaken to harmonise reason codes.



4.3.4. SMB decision

For inclusion in the 2019 SCT rulebook.



4.4. # 7: Extra reasons for the response to a SCT Inquiry

4.4.1. Description

This change request was made by the SEMWG.

The response-to-SCT Inquiry dataset in section 4.6.10 describes among others the attributes for the response to the inquiry "Claim of Non-Receipt". The dataset lists the attributes 42 (settlement date of the credit transfer) and 83 (non-receipt of the credit transfer) as possible responses.

However, it can happen that the Beneficiary Bank is not allowed to credit the Beneficiary due to a regulatory reason. Another scenario could be that the Beneficiary Bank has already sent a Reject or Return for this SCT transaction. The concerned dataset or the attribute AT-83 does not yet foresee the transmission of such reasons back to the Originator Bank.

The change request is to adapt the name and the description of the attribute AT-83 to cover such scenarios as well.

4.4.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2019**.

4.4.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

No explicit comments received.

4.4.4. SMB decision

For inclusion in the 2019 SCT rulebook.



4.5. # 8: Editorial restructuring of the rulebook sections on SCT rulebook processing flows

4.5.1. Description

This change request was made by the SEMWG.

With the publication of the SCT Inst rulebook in November 2016, the EPC tries to harmonise its two SCT rulebooks as much as possible.

To this end, the EPC proposes to restructure the sections 4.3 and 4.4 of the SCT rulebook in line with the set-up of these two sections under the SCT Inst rulebook.

The aim of this restructuring is to allow a better comparison of the processing flows between the two credit transfer-based EPC rulebooks. This specific change request does not contain any content changes.

4.5.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2019**.

4.5.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

No explicit comments received.

4.5.4. SMB decision

For inclusion in the 2019 SCT rulebook.



4.6. # 9: Inclusion of Extended Remittance Information (ERI) option

4.6.1. Description

This change request was made by the SEMWG.

The current SCT scheme permits the end-to-end carrying of remittance information (RI) with a maximum of 140 characters of unstructured RI. During the last years different stakeholder groups submitted change requests asking for a possibility to transmit more than just 140 characters in RI per SCT Instruction/ SCT Transaction message. To meet these previous demands from stakeholder groups, the EPC proposes a formal SCT rulebook **option** for Extended Remittance Information (ERI option). This option proposal has been worked out as a separate rulebook annex.

If this change request is accepted, it will have only an impact to those SCT scheme participants that wish to implement this option. SCT scheme participants that do not support this option do not have to make any investment (apart of adding an additional reason in the attribute AT-R3).

The major elements of this ERI option are:

- The ERI option supports the transmission and the processing of the following combination of RI in Credit Transfer Instructions and Transactions:
 - One occurrence of 140 characters of unstructured RI and
 - Up to 999 occurrences of 280 characters of structured RI based on the ISO 20022 standard.
- SCT scheme participants wishing to offer the rulebook ERI option, formally must declare their participation to this option to the EPC. Major condition for the participation to the ERI option is that the SCT scheme participant must support this option at least in the role of Beneficiary Bank.
- The Originator Bank must verify if the Beneficiary Bank is an ERI Option Participant or not. The Originator Bank only sends SCT transaction messages with ERI to Beneficiary Banks that are participants to the SCT ERI option. Beneficiary Banks not participating to the ERI option will only get one occurrence of 140 characters of unstructured RI.
- By default, the Beneficiary Bank submits only the occurrences of structured RI to the Beneficiary, unless the Beneficiary Bank and the Beneficiary have made an arrangement whereby the Beneficiary Bank submits the combination of unstructured RI and the structured RI to the Beneficiary.
- The messages used for exception processing and inquiries for ERI-populated SCT transactions must only contain the occurrence of 140 characters of unstructured RI.

4.6.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request as an **option** within the scheme (**option c**) entering into effect as of **November 2019**.



4.6.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

Even though the public consultation comments from EPC scheme participants (via national communities or via individual comments) to this change request are mixed whereas all other contributors fully support this change request, the SEMWG considers that this change request is still the best proposal to serve this market need.

Therefore, the SEMWG proposes to include this change request as **an option** within the scheme (**option c**) in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Atlas Copco Power and Flow Division Varisco Srl (Italy)	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
Bank Association of Slovenia	No - option e - cannot be part of the scheme. We do not have business case.
Benetton Group Srl (Italy)	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
Cifin Srl	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
CMB	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.



Contributor	Comments received
Comifar	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
Dayco Europe Srl (Italy)	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
Dolce & Gabbana Srl	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.



Contributor	Comments received
Dutch Payments Association	<p>No opinion - Dutch community does not require this option.</p> <p>It is of the utmost importance to make clear (and confirm) that this change does not lead to any impact for Scheme Participants that will not make use of the ERI option. In particular, the current scheme requirement to be able to use either one occurrence of 140 characters of unstructured remittance information OR one occurrence of 140 characters of structured remittance information MUST REMAIN UNCHANGED!</p> <p>It seems that resulting from this new ERI option it is proposed (in the draft of Annex V) to change the definition of AT-05 to cover for the unstructured remittance information only and to add a new attribute for the structured remittance information. This would imply that the present definition for AT-05 would change in such a way that the structured remittance part is no longer covered, which is in conflict with the "no impact for non participating scheme participants". Therefore, we strongly recommend the EPC to find a solution to cater for both the current definition of AT-05 AND the new ERI option.</p> <p>A possible solution is to keep AT-05 as it is and define one or two new attributes for the new ERI option, resulting in:</p> <p>1) AT-05: maximum of 140 characters of Unstructured or Structured Remittance Information. 2a) AT-xx: a maximum of 140 characters of Unstructured Remittance Information 2b) AT-xx: a maximum of 999 occurrences of 280 characters of structured Remittance Or combine 2a) and 2b) into one new attribute.</p>
E.ON Italia SpA	<p>Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.</p>
European Association of Corporate Treasurers (EACT)	<p>Yes - We support the CR. We suggest to name it "Tabasso Option" in memory of Gianfranco Tabasso, former Chairman of the EACT payments commission.</p>



Contributor	Comments received
Fagioli SpA	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
French Banking Federation	Yes - So far, no such need has been expressed on the French banking market. Consequently, the option is the best way to include ERI as it will not be burdensome for the communities which are not interested in its implementation. Furthermore, the principles defining the use of this option should precisely be defined and understood among all the participants involved in the process.
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	No - A majority of 72 % (= 1077 participants) of the German scheme participants does not support the SEM recommendation (= option e), while 28 % (= 415 participants) support it (= option c).
Harmont & Blaine SpA	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
Italian Association of Corporate Treasurers (AITI)	Yes - AITI fully supports the CR. We suggest to name it "Tabasso Option" in memory of Gianfranco Tabasso, former Deputy Chairman of AITI and Chairman of the EACT payments commission.
Italian Banking Association	Yes - The majority of the Italian banks supports the CR. Nevertheless few Italian banks don't support it for the following reasons: <ul style="list-style-type: none"> - there is no need to extend the remittance information in a payment transaction; - in order to harmonize SEPA schemes it would be better to avoid optional solution that creates fragmentation.



Contributor	Comments received
Livanova PLC (Italy)	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
LVT Srl (Italy)	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
Nice SpA (Italy)	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
Norwegian Banking Community	No - Norwegian banks prefer a solution where the proposed option becomes mandatory to receive for all Beneficiary banks, and that no separate EIR agreement is needed. But the information should only be forward to customers that has an agreement with the Beneficiary bank.
OP Financial Group	Yes - Sending bank should be obliged to check the validity of the ERI.
Orafluid Srl	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.



Contributor	Comments received
Pirelli & C. SpA	Yes - We support the introduction of the option to the Scheme since increases the capability of Straight Through Processing reconciliation of remittances, reducing the human effort required to book the amounts credited by customers. The increased space for structured remittance information should be sufficient to transfer all information required to identify the invoices /credit notes paid with the credit transfer.
Prestofresco SpA (Italy)	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
Progeo SCA (Italy)	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
SKF Industrie SpA	Yes - We support the CR since increases the capability of Straight Through Processing reconciliation of remittances, reducing the effort required to properly book the amount credited. The increased space for structured remittance information should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment.
Slovak Banking Association	No - We consider current SEPA Scheme definition for remittance information field as sufficient. There is no evidence of a need for extension of remittance information in Slovakia. We hold the same position for request to have structured and unstructured remittance information in a single payment transaction.
Spanish Banking Community	No - No demand.



Contributor	Comments received
Stuzza Austria	No - We think that this option will not be offered by many banks and not be used by many customers. The consequence of the implementation is a huge effort for all involved parties. (limited for corporate clients only!) We recommend therefore the development of an own B2B scheme.
Swiss Banking Community	No - option d or e: 1. The change request does not refer which message types are affected, e.g. pacs.002/pacs.004/pacs.008 2. Requirements for sanctions screening/compliance filtering steadily increase. We expect banks to be required to filter/screen those information which is an additional and unnecessary workload. 3. Performance of payment systems is negatively affected due to the massive upgrade of the payload. As there is a tendency for real-time processing only important information should be transported. 4. 140 characters should be sufficient, banks should not be enforced to massively invest in the expansion of those fields. 5. Even if this change request is considered as optional, we suspect that this feature will be made mandatory for all participants in future.
UK Finance	Yes - UK community are of the view that as long as extended remittance information remains optional, the UK community is supportive. Current UK client reporting solutions would not be able to support unstructured and structured due to limitations of MT940 reporting. This could lead to a degradation of service.

4.6.4. SMB decision

For inclusion as an option (option c) in the 2019 SCT rulebook.



4.7. # 10: Change request has been withdrawn

4.7.1. Description

This change request has been withdrawn.



4.8. # 11: Change request has been withdrawn

4.8.1. Description

This change request has been withdrawn.



4.9. # 15: Mandatory use of the acmt.022 message in the interbank space

4.9.1. Description

This change request was made by Deutsche Bank.

It proposes that all scheme participants are obliged to support

- sending and receiving ISO IdentificationModificationAdviceV02 (acmt.022);
- forwarding electronically ISO IdentificationModificationAdviceV02 (acmt.022) to their (corporate) clients if requested by their clients.

The request would entail that an additional message must be sent from the creditor agent to the debtor agent in case of SCT to inform the transaction initiator about changes in the counterparty account details, e.g. new IBAN, new BIC or new bank relationship. In practice, it would be mandatory for

- the Beneficiary Bank to inform the Originator Bank in case Beneficiary account details have changed;
- the Originator Bank makes this information available to the Originator upon request of the Originator, i.e. if the Originator can process the acmt.022 message.

The contributor further reports that such change would respond to the “Directive 2014/92/EU of the European Parliament and of the Council of 23 July 2014 on the comparability of fees related to payment accounts, payment account switching and access to payment accounts with basic features”.

4.9.2. SEMWG analysis and recommendation for the public consultation

The SEMWG recommends not taking forward the change request (**option e**).

This change request is not related a specific type of EPC SEPA transaction. It applies to the customers’ general account administration management.

The SEMWG sees this change request outside the scope of the EPC SEPA schemes. Furthermore, the request has also personal data protection implications which have to be investigated as well.

4.9.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2019 SCT Rulebook version 1.0.



Explicit public consultation comments received

Contributor	Comments received
French Banking Federation	No opinion - We understand the EPC position to consider this change request as being out of scope. However this CR makes sense as this message is very useful for the originator in case of IBAN change due to the beneficiary bank (merger, spin-off...). Overall, the use of this message at the SEPA level might contribute to the quality of the scheme. Could be passed on to the module 2.
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	Yes - However three German scheme participants (= 0,2 %) support the original change request (= option b)
UK Finance	Yes - The message type is not part of the core settlement mechanism, but this is a problem institutions face and any AOS that can support account number switching would be of benefit.

4.9.4. SMB decision

Not to be included in the 2019 SCT rulebook.



4.10. # 17: Addition of a Repayment service

4.10.1. Description

This change request was made by EuroCommerce.

(note from the EPC: even though the change request itself exclusively refers to the SCT Inst scheme, the EPC has included this request also in the 2018 SCT rulebook change management cycle to harmonize as best as possible both SCT rulebooks in case this change request would be supported).

Currently the SCT rulebooks define that when the Beneficiary's account has already been credited and the Beneficiary wishes to return the funds, it can only do this by initiating a new SCT (Inst) transaction.

The contributor points out that payers purchasing goods or services at merchant points of sale often change their mind, return the goods or refine their requirements post event. The contributor believes that payers should be entitled to obtain a refund through the original payment method seamlessly whilst ensuring a consistent user experience.

The contributor therefore proposes to include an automated refund service in the SCT Inst scheme to enable the Beneficiary to promptly reimburse/refund the Originator, either in full or in part. Only the Beneficiary would be able to initiate such refund transaction.

As the Beneficiary may not receive the information on the IBAN of the Originator in the bank-to-customer credit transfer data set, the refund transaction should refer to the payment reference of the initial SCT Inst transaction which the Beneficiary has received from the Beneficiary Bank. With this reference, the Beneficiary Bank can retrieve all necessary details of the initial SCT Inst transaction to reimburse the Originator.

4.10.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request into the scheme (**option b**).

The SEMWG proposal is to include clarifications in the IGs through new usage rules, and in the Clarification Paper of the SCT and SCT Inst rulebooks how to execute such repayment.

4.10.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A majority of EPC scheme participants (via national communities or via individual comments) and a vast majority of other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

As the SEMWG recommendation for the public consultation was to include clarifications in the IGs and in the Clarification Paper of the SCT and SCT Inst rulebooks, the SEMWG considers that nothing needs to be changed or added in the 2019 SCT Rulebook version 1.0 itself (**option a**). A Repayment is technically considered as a new SCT transaction.



The SEMWG proposes to include usage rules in the Customer-to-Bank IGs for electronically bundled SCT transactions in ISO 20022 XML format when the Beneficiary wants to initiate a Repayment for an earlier settled SCT transaction, and to provide guidance in the Clarification Paper of the SCT and SCT Inst rulebooks. This will also include the case in which the Beneficiary has not received the IBAN of the Originator in the earlier settled SCT transaction.

Therefore, the SEMWG proposes not to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Bank Association of Slovenia	No - option e - cannot be part of the scheme.
Banking & Payments Federation Ireland	Yes - assuming that only those in the SCT Inst scheme can make a repayment using SCT Inst.
Dutch Payments Association	No - We propose option e. This should not be considered as part of the Rulebook. We fully support EPC to include this in the Clarification Paper of the SCT and SCT Inst Rulebooks.
equensWorldline	No opinion - we would support this change only in case that the repayment service is implemented as a new service and not as a new R-transaction flow that demands additional validations.
European Association of Corporate Treasurers (EACT)	Yes - We support the change request. We suggest anyway to limit the usage of such a service to the refund of the initial SCT transaction.
Finance Finland	No - this should be c), optional feature that the beneficiary bank could offer to the beneficiary according to common standard. Interbank this would be a normal SCT.
French Banking Federation	Yes - in France Originator IBAN cannot be provided to the beneficiary as it is considered as a private data. Consequently, it is necessary to clearly identify the repayment as such in the initiation message and to provide clear information allowing the bank of the merchant to find the original payment (ie the IBAN of the originator of the initial payment). In any case, this service rendered by the beneficiary bank should remain optional.



Contributor	Comments received
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	Yes - however 954 German scheme participants are of the opinion that this proposal is already covered by the scheme (=option a) and therefore consider the proposal as a clarification only.
Italian Association of Corporate Treasurers (AITI)	Yes - AITI supports the change request. We suggest anyway to limit the usage of such a service to the refund of the initial SCT transaction only.
Italian Banking Association	Yes - Please take into consideration the following comments: <ul style="list-style-type: none"> - in order to keep aligned SCT and SCT Inst Rulebooks one bank suggests to include this CR also in SCT Inst Rulebook; - One Bank remarks that this CR requires other specific rules (ex. IBAN of the Originator unknown to the Beneficiary, refund amount not greater than the original one...etc.).
Spanish Banking Community	No - option c - in any case it should not be understood as being part of the rulebook but IG's usage rules and clarification papers.
Stuzza Austria	Yes - the repayment service should be configured in a way that it is user-friendly and the involved parties can easily match the repayment with the original payment.



Contributor	Comments received
Swiss Banking Community	<p>No opinion - no conclusion as two of five task force members vote with no: If the process would be implemented we assume/suggest that it will be done via pacs.004 (Payment Return). Reasons are:</p> <ul style="list-style-type: none"> • pacs.004 includes the original message ID of the pacs.008. The beneficiary bank can therefore match the original customer payment. • pacs.004 includes the original End2End ID, the receiver of the pacs.004 can match the messages on STP basis. • pacs.004 offers the option for a reason code. The customer can decide himself, whether reason he wants to use (and which code). • pacs.004 supports confidentially. If the pacs.004 does not include a reason code the receiver of the return can't just recognize if the account does exist or not. Example: A fraudulent user wants to check if an account exists and transfers 0,01 Euro. If the payment is returned by pacs.008 the payer (fraudulent user) knows that the account exists and could misuse this information. If pacs.004 without reason code is used this inference would not be possible. • using pacs.008 is not a good option for swiss customers as the EU-directive does not apply for Switzerland. With pacs.008 additional fees could be charged, which should not be the case with pacs.004.
UK Finance	<p>No - we are of the view that the required changes will be considerable and expensive for something that will effect a very small amount of transactions. We believe that the reference to "part" of a payment is concerning. We would potentially see a need for this Request as Instant Payments evolve but a November 2019 release date may be too early. Whilst this CR could offer benefits in the corporate space it could become mis-used within the retail sector.</p>

4.10.4. SMB decision

Not to be included in the 2019 SCT rulebook.

Just one remark is to be added in the rulebook dataset DS-01 Customer-to-Bank SEPA Credit Transfer Information specifying in which circumstances the Beneficiary can provide an alternative identifier to the IBAN of the account of the Originator.

Instead, usage rules will be included in the Customer-to-Bank IGs for electronically bundled SCT transactions in ISO 20022 XML format when the Beneficiary wants to initiate a Repayment for an earlier settled SCT transaction, and further guidance will



be provided in the Clarification Paper of the SCT and SCT Inst rulebooks (see EPC 131-17). This will include the case in which the Beneficiary has not received the IBAN of the account of the Originator in the earlier settled SCT transaction.



4.11. # 18: Extension response deadline for Beneficiary Banks to a Request for Recall by the Originator (RFRO)

4.11.1. Description

This change request was made by the Dutch Payments Association.

The contributor suggests extending the period for Beneficiary Banks from 10 to 15 Banking Business Days after the receipt of the Request for Recall by the Originator (RFRO), for providing either a positive or negative answer to the Originator Bank.

Extending the period to respond increases the likelihood for Beneficiary Banks to receive, if needed, the proper authorization from the Beneficiaries for debiting their account in time.

4.11.2. SEMWG analysis and recommendation for the public consultation

This change would prevent unnecessary negative answers to Originator Banks caused by Beneficiaries who are not able to provide their proper authorization for debiting their account to the Beneficiary Bank in time. The quality of the outcome of the RFRO procedure would improve substantially.

To achieve as much as possible consistency between similar types of exception handling, the SEMWG recommends extending the maximum period for Beneficiary Banks to respond to a **Recall** procedure from 10 to 15 Banking Business Days. This measure will increase the quality of the outcome of the Recall procedure.

The SEMWG suggests incorporating the change request **both for Recall and RFRO** into the scheme (**option b**) entering into effect as of **November 2019**.

Each stakeholder taking part in the public consultation of the 2018 SCT rulebook change management cycle, is invited to indicate if:

- a) It supports the change request related to the RFRO procedure
- b) It is in favour to extend the response deadline for Beneficiary Banks for a Recall procedure from 10 to 15 Banking Business Days

4.11.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request for the RFRO **and** the Recall procedures in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Bank Association of Slovenia	Item a): NO Item b): NO Existing 10 business days are enough.
Finance Denmark	Item a): NO Item b): NO



Contributor	Comments received
	The Danish community does not support this suggestion but would prefer such r-scenarios to be corrected asap after the actual incident within the present timeline.
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	Item a): YES Item b): YES The support of this CR is under the condition that the same response deadlines will be applied to both, the Recall procedure and to the RFRO procedure.
Italian Banking Association	Item a): YES Item b): YES It's important that this CR is included also in the SCT Inst scheme.
Nordea Bank Group	Item a): NO Item b): NO The Nordea Bank Group does not support this suggestion but would prefer such r-scenarios to be corrected asap after the actual incident within the present timeline.
UK Finance	Item a): YES Item b): YES The additional window increases the likelihood of positive response to recall requests.

4.11.4. SMB decision

For inclusion in the 2019 SCT rulebook.



4.12. # 19: Possibility for the Originator to request Beneficiary details following a negative answer to a Request for Recall by the Originator

4.12.1. Description

This change request was made by the Dutch Payments Association and relates to the Request for Recall by the Originator (RFRO) procedure.

The contributor suggests expanding the possibility of appeal for the Originator if a negative answer to the Request for Recall is received from the Beneficiary Bank.

If the Beneficiary Bank is obliged to provide a negative answer, nowadays the communicated decision from the Beneficiary, regarding the concerned initial Credit Transfer, is final from the perspective of the Originator Bank as well as the Beneficiary Bank.

However, the Originator can (still) disagree with this communicated decision and might wish to contact the Beneficiary directly, to take legal action. Since the Originator has no access to the correct contact details of the Beneficiary, the Originator Bank can ask for the correct contact details (Name, Address, Place) of the Beneficiary via the Beneficiary Bank.

After this request the Beneficiary Bank can provide the Originator Bank with the requested contact details (Name, Address, Place). However, the (non-intended) Beneficiary always can submit a well-founded objection to this provision of the requested contact details (Name, Address, Place) to the Beneficiary Bank. The Beneficiary Bank will inform the Originator Bank as soon as possible about this objection.

4.12.2. SEMWG analysis and recommendation for the public consultation

The SEMWG recommends not taking forward the change request (**option e**). It sees national data protection obstacles in several countries to share such information about the Beneficiary.

With such national limitations in sharing personal data in mind and taking the assumption that such procedure would be based on ISO 20022 messages, the SEMWG is concerned about the uneven balance between the implementation costs of such procedure and the number of such requests filed by Originators.

Each stakeholder taking part in the public consultation of the 2018 SCT rulebook change management cycle, is invited to indicate if:

- a) It supports the change request related to the RFRO procedure
- b) It is in favour to apply this change request as well to the **Recall** procedure

4.12.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A vast majority of EPC scheme participants (via national communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that a majority of the limited number of other contributors that expressed a position, do support the change request.



In consideration of the overall comments received, the SEMWG proposes not to include this change request in the 2019 SCT rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
<p>Dutch Payments Association</p>	<p>"Item a): NO - the NL community wants this option to be included in the RB.</p> <p>Item b): NO - also applicable to the Recall procedure.</p> <p>This change request should be incorporated into the scheme; option b.</p> <p>The proposed change already caters for the objection by the Beneficiary to share this information, the Rulebook could also provide the Beneficiary PSP with the option to object to share this information in case national data protection laws and regulations prohibit sharing this information.</p> <p>Furthermore, PSPs must comply with PSD2 art. 88.3:</p> <p>3. However, the payer's payment service provider shall make reasonable efforts to recover the funds involved in the payment transaction. The payee's payment service provider shall cooperate in those efforts also by communicating to the payer's payment service provider all relevant information for the collection of funds.</p> <p>In the event that the collection of funds under the first subparagraph is not possible, the payer's payment service provider shall provide to the payer, upon written request, all information available to the payer's payment service provider and relevant to the payer in order for the payer to file a legal claim to recover the funds.</p> <p>In case the payer, ultimately, wants to file a legal claim to recover the funds, he needs Beneficiary details. When the RFRO does not cater for sharing this information, other means of communication are required (such as MT199) to request this information once the RFRO has been completed. This is considered a very inefficient way of working."</p>
<p>EuroCommerce</p>	<p>Item a): NO Item b): NO</p> <p>EuroCommerce believes the change request ought to remain. If there were a negative RFRO or Recall due to errors in ownership of the current account credited, the Originator has no mechanism to trace or contact the beneficiary. If a negative authorisation response</p>



Contributor	Comments received
	was received from the beneficiary to disclose its data, contact details of the beneficiary could be sought.
European Association of Corporate Treasurers (EACT)	Item a): NO Item b): NO We support the change request, since in the case of negative RFRO or Recall due to errors in ownership of the current account credited, the Originator have no alternatives to trace and contact the beneficiary. In case of negative authorization from the beneficiary to disclose its data, contact data of the beneficiary bank could be returned.
French Banking Federation	Item a): YES Item b): YES Doesn't make sense for the recall procedure neither.
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	Item a): NO Item b): NO We support the Dutch proposal. The change proposal should become part of the scheme. The support of this CR is under the condition that it will be applied to both, the Request for Recall and the RFRO.
Italian Association of Corporate Treasurers (AITI)	Item a): NO Item b): NO AITI supports the change request, since in the case of negative RFRO or Recall due to errors in ownership of the current account credited, the Originator could have no alternatives to trace and contact the beneficiary, especially if it has no relationships with it. In case of negative authorization from the beneficiary to disclose its data, at least contact data of the beneficiary bank could be returned.
Norwegian Banking Community	Item a): YES Item b): YES We support the recommendation from SEMWG that this cannot be part of the existing scheme, since this involves sharing of personal data (sensitive data). This means No for both item a and b.
UK Finance	Item a): NO OPINION Item b): NO OPINION We are concerned that this would not fit with the National Data Protection Legal Requirements.

4.12.4. SMB decision

Not to be included in the 2019 SCT rulebook.



4.13. # 25: SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries

4.13.1. Description

This change request was made by the Payment Committee Switzerland.

The actual version of the rulebooks and implementation guidelines request that the BIC code is mandatory if a bank is located in a non-EEA SEPA country or territory.

The contributor proposes

- To allow bank customers in SEPA countries to use <<IBAN-only>> also for banks located in non-EEA SEPA countries or territories. The request is to delete the obligation that BIC is mandatory for non-EEA SEPA countries or territories in all EPC rulebooks and implementation guidelines.
- If (for any reason) it is not possible to allow bank customers in SEPA countries to use <<IBAN-only>> for all non-EEA SEPA countries or territories the change request should be interpreted to allow <<IBAN-Only>> for payments from/to Switzerland.

The change request explains in detail the arguments for dropping the EPC rulebook rule of IBAN+BIC for transactions to and from non-EEA SEPA countries.

4.13.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request into the scheme (**option b**).

If a SCT scheme participant can support the acceptance and the processing of a SCT instruction from the Originator containing an IBAN but not the related BIC, even if one of the two SCT scheme participants covered by that SCT instruction is based in a non-EEA SEPA country, it is allowed to do so and to communicate this service to its customers.

4.13.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2019 SCT Rulebook version 1.0.



Explicit public consultation comments received

Contributor	Comments received
French Banking Federation	Yes - We support this CR as long as the EEA located PSP still have the possibility for outgoing transaction to demand the beneficiary Bank BIC from the originator. To allow end-to-end STP cross-border transactions processing between PSP based in EEA and non-EEA countries, PSP in the EEA need to be able to always derive a BIC from an IBAN for an account managed in an non-EEA country." If not, BIC of the receiving party should continue to be asked. A prerequisite to IBAN-only transaction processing also for non-EEA countries is to always have at least one reliable register in order to derive one BIC from an IBAN.

4.13.4. SMB decision

For inclusion in the 2019 SCT rulebook.



4.14. # 27: Inclusion of incoming One-Leg Out euro credit transfers

4.14.1. Description

This change request was made by Bank of America Merrill Lynch.

The contributor proposes to allow payments originated outside of SEPA to be allowed to be sent / processed as SCT transactions in SEPA.

This will ensure comparable treatment for SEPA zone residents irrespective of the origination of these types of credit transfer. The change will ensure that a SEPA credit transfer will be able to be originated without the need for the originator payment account to be in the SEPA zone.

Currently, the only way in which these payments can be received are by way of cross-border wires or cheques / bank drafts which can incur significant bank fees in transit so meaning the beneficiaries receive less funds than originally expected.

4.14.2. SEMWG analysis and recommendation for the public consultation

The SEMWG recommends not taking forward the change request (**option e**). The change request has too many possible implications requiring first a thorough operational and legal analysis before it can be included within the rulebook change management cycle.

4.14.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
EuroCommerce	Yes - We agree with the principles of the change request but think further evaluation is required.
European Association of Corporate Treasurers (EACT)	Yes - We share the principles of the CR but we believe it has to be further evaluated.
Italian Association of Corporate Treasurers (AITI)	Yes - AITI believes that incoming One Leg Out credit transfers should be allowed in the SCT and shares the principles of the CR. Anyway we agree that time is needed to properly evaluate such opportunity.



Contributor	Comments received
UK Finance	No opinion - UK community supports further work being undertaken to ascertain how this could be introduced, and the implications this would have for the future of SEPA, competitiveness and on the scheme participants.

4.14.4. SMB decision

Not to be included in the 2019 SCT rulebook.



4.15. # 28: Inclusion of R-transaction reason code ED05

4.15.1. Description

This change request was made by equensWorldline.

As the rulebooks currently do not include many technical codes, every clearing institution or CSM defines its own error codes. The error codes are not included in the main interbank formats. Therefore, technical errors often can only be mapped to the reason code MS03 (= reason not specified) when forwarded to another participant. This leads to lack of clarity, misunderstandings, requests for clarification and repetition of the errors.

The contributor suggests implementing the R-transactions reason code ED05 (= "Settlement of the transaction has failed"). This code should be foreseen in the pacs.002 (SCT Reject) from the CSM to the Originator Bank. ED05 is more specific than MS03 (= Reason not specified), which is currently being used.

4.15.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request into the scheme (**option b**).

This provides clarity on the concrete reason of an unsuccessfully executed SCT transaction to the Originator Bank.

4.15.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
French Banking Federation	No opinion - No disagreement on the proposed change request. Anyway we assume that the relation between CSM and PSP is outside the scope of the RB. Consequently, on a basis of a bilateral agreement, a CSM can already pass on pre-agreed reason code transaction to the PSP even though the reason code has not been defined by EPC.
UK Finance	No opinion - We are of the view that more detail and clarity should be provided before we are able to give an opinion e.g. when would this be used.

4.15.4. SMB decision

For inclusion in the 2019 SCT rulebook.



4.16. # 29: Inclusion of R-transaction reason code CNOR

4.16.1. Description

This change request was made by equensWorldline.

As the rulebooks currently do not include many technical codes, every clearing institution or CSM defines its own error codes. The error codes are not included in the main interbank formats. Therefore, technical errors often can only be mapped to the reason code MS03 (= reason not specified) when forwarded to another participant. This leads to lack of clarity, misunderstandings, requests for clarification and repetition of the errors.

The contributor suggests implementing the R-transactions reason code CNOR (= "Creditor bank is not registered under this BIC in the CSM"). This code should be foreseen in the pacs.004 (SCT return). Currently CNOR is allowed only in the pacs.002 and pain.002.

CNOR is needed in the SCT Return (pacs.004) between the EACHA-CSMs, in the following scenario:

CSM1 sends a credit transfer to CSM2, but CSM2 has no route to the Beneficiary Bank ("no reach"). CSM2 then returns (pacs.004 with CNOR), not rejects (pacs.002), the credit transfer back to CSM1 because in the return process (pacs.004) also the funds are returned to CSM1 automatically (whereas in the reject process (pacs.002) the funds have to be booked back manually, which is more work than automatically).

If CSM1 forwards the pacs.004 to the Originator Bank it can use CNOR also in this case. CNOR then replaces the current code MS03 (= Reason not specified), MS03 is not specific enough.

4.16.2. SEMWG analysis and recommendation for the public consultation

The SEMWG suggests incorporating the change request into the scheme (**option b**).

This provides clarity on the concrete reason of an unsuccessfully executed SCT transaction to the Originator Bank.

4.16.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
French Banking Federation	No opinion - See our comment to CR #28.



4.16.4. SMB decision

For inclusion in the 2019 SCT rulebook.



4.17. # 32: Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs

4.17.1. Description

This change request was made by equensWorldline.

The EPC rulebooks currently define SEPA Usage Rules but not the responsibilities for executing these. All too often there is lack of clarity if a certain check/validation must be done, can be done or must not be done by a participant that is not the Creditor Agent or Debtor Agent. The contributor provides a number of examples to highlight the current situation.

The contributor states that it must be clear to all the parties involved in the processing chain who is responsible for which validation. EPC should define the responsibilities in general or for each SEPA Usage Rule in the implementation guidelines.

The in-depth checks and validation should be performed exclusively by the bank of the end users. The other involved interbank players should only reject a payment if it is not possible to forward (e.g. format validations fail, BIC is not reachable).

4.17.2. SEMWG analysis and recommendation for the public consultation

The SEMWG recommends not taking forward the change request (**option e**).

The responsibilities defined in the rulebook remain assigned to the scheme participants even though the actual execution of the duties linked to these responsibilities is done by other parties. It is up to each scheme participant on how to enforce this delegation of responsibilities to these other parties.

4.17.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) to the 2018 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme. No formal position on this change request had been reported by the other contributors.

Therefore, the SEMWG proposes not to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
equensWorldline	No - we think that it is necessary EPC to trigger the discussion between CSMs.

4.17.4. SMB decision

Not to be included in the 2019 SCT rulebook.



4.18. # 35: Extension of the period for the Originator Bank to submit a Recall request

4.18.1. Description

This change request was made by the Spanish banking community.

The current SCT rulebook states that a Recall can only be executed as long as the credit transfer processed had been executed up to 10 banking business days ago.

The contributor suggests extending the period in which an Originator Bank could request a Recall from 10 to 30 banking business days. Nevertheless, the period during which an answer to the Recall from the Beneficiary Bank remains the same (i.e. within 10 banking business days).

The main aim of this proposal is to avoid manual actions for Recalls that occur when the period of 10 banking business days has passed. Currently, after this period, the actions of the Originator Bank to retrieve a credit transfer are sending an email, SWIFT message or a fax to the Beneficiary Bank, or contacting it by phone.

4.18.2. SEMWG analysis and recommendation for the public consultation

The SEMWG recommends not taking forward the change request (**option e**).

The current 10 banking business days period is especially designed to handle technical reasons and duplicates even though it can also be used for fraud. Technical reasons and duplicates should be detected by the Originator Bank and be resolved as quickly as possible.

After these first ten banking business days, the Originator Bank or the Originator can fall back to the Request for Recall by the Originator (RFRO) process which gives up to 13 months to make such RFRO.

4.18.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Portuguese Banking Community	No - We support the proposal of the Spanish community.
Spanish Banking Community	No - Option b.



Contributor	Comments received
UK Finance	No opinion - The UK community had a mixed response. Some stakeholders had concerns that the 'request for recall' to Originator could lead to institutions divulging personal information e.g. addresses. Others felt this CR was merely an extension of the window in which transactions could be submitted, which would be useful, and therefore they disagree with the SEMWG. The UK Community would appreciate some more detail on the CR and why it is felt it could not be implemented.

4.18.4. SMB decision

Not to be included in the 2019 SCT rulebook.



4.19. # 37: Extended Remittance Information option to deliver extended structured remittance information to the Beneficiary

4.19.1. Description

This change request was made by the European Association of Corporate Treasurers (EACT).

The contributor suggests inserting an option (“Extended Remittance Information” option) in the rulebook to properly manage the delivery to the Beneficiary of extended structured remittance information.

4.19.2. SEMWG analysis and recommendation for the public consultation

The SEMWG itself proposes an Extended Remittance Information option under change request # 9 which takes in account the change requests # 37, 38, 39, 41, 42 and 43.

Therefore, the SEMWG does not propose a concrete recommendation for the change request # 37 for the public consultation.

The SEMWG looks forward to the comments on the general topic of extended remittance information from the stakeholders taking part in the public consultation.

4.19.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A majority of EPC scheme participants (via national communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that a large majority of the other contributors do support the change request.

In consideration of the overall comments received, the SEMWG considers that the change request # 09 is the best proposal to serve this market need.

The SEMWG proposes not to include this change request but instead the change request # 09 **as an option (option c)** in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Atlas Copco Power and Flow Division Varisco Srl (Italy)	Yes - We agree to cover this CR within CR # 9.
Bank Association of Slovenia	No - option e - cannot be part of the scheme. We do not have business case.
Benetton Group Srl (Italy)	Yes - We agree to cover this CR within CR # 9.
Cifin Srl	Yes - We agree to cover this CR within CR # 9.
CMB	Yes - We agree to cover this CR within CR # 9.



Contributor	Comments received
Comifar	Yes - We agree to cover this CR within CR # 9.
Dayco Europe Srl (Italy)	Yes - We agree to cover this CR within CR # 9.
Dolce & Gabbana Srl	Yes - We agree to cover this CR within CR # 9.
Dutch Payments Association	See #9
E.ON Italia SpA	Yes - We agree to cover this CR within CR # 9.
European Association of Corporate Treasurers (EACT)	Yes - We agree to cover this CR within CR # 9.
Fagioli SpA	Yes - We agree to cover this CR within CR # 9.
Fater SpA	Yes - We agree to cover this CR within CR # 9.
Finance Denmark	No - Finance DK would like to see the result and experience gained following the implementation of CR #09 before considering this CR
Finance Finland	No - See answer to cr #09
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	No support, see response to CR #9
Harmont & Blaine SpA	Yes - We agree to cover this CR within CR # 9.
Italian Association of Corporate Treasurers (AITI)	Yes - AITI supports the change request. AITI agrees to cover this CR within CR # 9.
Italian Banking Association	No - We don't support the CR. We support the CR # 9.
Livanova PLC (Italy)	Yes - We agree to cover this CR within CR # 9.
Luxembourg Bankers' Association	Yes - cf. CR # 9
LVT Srl (Italy)	Yes - We agree to cover this CR within CR # 9.
Nice SpA (Italy)	Yes - We agree to cover this CR within CR # 9.
Nordea Bank Group	Nordea Bank Group would like to see the result and experience gained following the implementation of CR #09 before considering this CR



Contributor	Comments received
Orafluid Srl	Yes - We agree to cover this CR within CR # 9.
Pirelli & C. SpA	Yes - We agree to cover this CR within CR # 9.
Prestofresco SpA (Italy)	Yes - We agree to cover this CR within CR # 9.
Progeo SCA (Italy)	Yes - We agree to cover this CR within CR # 9.
SKF Industrie SpA	Yes - We agree to cover this CR within CR # 9.
Slovak Banking Association	See change request 09
Stuzza Austria	No - We don' t see a demand and the consequence of the implementation is a huge effort for all involved parties.
Swiss Banking Community	No - Cannot be part of the existing scheme – option e -- See answer on # 9

4.19.4. SMB decision

Not to be included in the 2019 SCT rulebook. Reference is made to the SMB decision for change request item #09 (see section 4.6.4 of this document).



4.20. # 38: Amendment in business requirements for Attribute AT-05 - The Remittance Information

4.20.1. Description

This change request was made by the European Association of Corporate Treasurers (EACT).

The contributor suggests amendments in the business requirements for the attribute AT-05 - The Remittance Information sent by the Originator to the Beneficiary in the Credit Transfer – when structured remittance information is used. Its proposal is that ‘Structured Remittance Information’ should be redefined in the rulebook as ‘Structured Machine to Machine Remittance Information’.

It further proposes that business requirements, implementation guidelines and clarification papers have a specific mention to automatic treatment of the information and an indication that such information should be transferred to the Beneficiary only when electronic means in the bank-to-customer space are used, such as in electronic account statements or other electronic formats using dataset DS-04 - Bank to customer credit transfer information (optional in other cases).

It further requests to evaluate the possibility to have a specific new attribute code for the renamed “Structured Machine to Machine Remittance Information”.

Considering the opportunity to use the available ISO 20022 standard for end to end straight-through-processing reconciliation, the contributor proposes that the Beneficiary Bank may drop received ‘Structured Machine to Machine Remittance Information’ and not make it available to a Beneficiary who is connected with an interface which does not comply with the ISO 20022 XML standard.

4.20.2. SEMWG analysis and recommendation for the public consultation

The SEMWG itself proposes an Extended Remittance Information option under change request # 9 which takes in account the change requests # 37, 38, 39, 41, 42 and 43.

Therefore, the SEMWG does not propose a concrete recommendation for the change request # 38 for the public consultation.

The SEMWG looks forward to the comments on the general topic of extended remittance information from the stakeholders taking part in the public consultation.

4.20.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A majority of EPC scheme participants (via national communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that a large majority of the other contributors do support the change request.

In consideration of the overall comments received, the SEMWG considers that the change request # 09 is the best proposal to serve this market need.

The SEMWG proposes not to include this change request but instead the change request # 09 **as an option (option c)** in the 2019 SCT Rulebook version 1.0.



Explicit public consultation comments received

Contributor	Comments received
Atlas Copco Power and Flow Division Varisco Srl (Italy)	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
Bank Association of Slovenia	No - option e - cannot be part of the scheme. We do not have business case.
Benetton Group Srl (Italy)	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
Cifin Srl	Yes - we support the change request. Gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
CMB	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9
Comifar	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9
Dayco Europe Srl (Italy)	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
Dolce & Gabbana Srl	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9
Dutch Payments Association	See #9



Contributor	Comments received
E.ON Italia SpA	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
equensWorldline	Since change #9 is an optional feature, and this particular point is part of the feature, eWL supports this change as proposed by EACT.
EuroCommerce	Yes - we support the change request particularly as it would provide clarification when structured remittance information (typically machine to machine), are used as well as allowing the different treatment of structured and unstructured information.
European Association of Corporate Treasurers (EACT)	Yes - we support the change request. Gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
Fagioli SpA	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9
Fater SpA	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9
Finance Denmark	No - Finance DK would like to see the result and experience gained following the implementation of CR #09 before considering this CR
Finance Finland	No - See answer to cr #09.
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	No support, see response to CR #9.
Harmont & Blaine SpA	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9



Contributor	Comments received
Italian Association of Corporate Treasurers (AITI)	Yes - AITI supports the change request since it gives better clarification when structured remittance information (machine to machine) are used. It allows different treatment of structured and unstructured information. AITI agrees to cover this CR within CR # 9
Italian Banking Association	No - We don't support the CR. We support the CR # 9.
Livanova PLC (Italy)	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
Luxembourg Bankers' Association	Yes - cf. CR # 9.
LVT Srl (Italy)	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
Nice SpA (Italy)	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
Nordea Bank Group	Nordea Bank Group would like to see the result and experience gained following the implementation of CR #09 before considering this CR.
Orafluid Srl	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9
Pirelli & C. SpA	Yes - we support the change request since allows different treatment of structured and unstructured information. We agree to include this CR within CR # 9.
Prestofresco SpA (Italy)	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.



Contributor	Comments received
Progeo SCA (Italy)	Yes - we support the change request. It gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
SKF Industrie SpA	Yes - we support the change request. Gives better clarification when structured remittance information (machine to machine) are used. Allows different treatment of structured and unstructured information. We agree to cover this CR within CR # 9.
Slovak Banking Association	See change request 09.
Stuzza Austria	We don' t see a demand and the consequence of the implementation is a huge effort for all involved parties.
Swiss Banking Community	No - Cannot be part of the existing scheme – option e -- See answer on # 9.

4.20.4. SMB decision

Not to be included in the 2019 SCT rulebook. Reference is made to the SMB decision for change request item #09 (see section 4.6.4 of this document).



4.21. # 39: Option to allow contemporaneous presence of unstructured and structured remittance information

4.21.1. Description

This change request was made by the European Association of Corporate Treasurers (EACT).

The contributor suggests introducing an option to allow contemporaneous presence of unstructured and structured remittance information in payment messages from Originator to Beneficiary.

4.21.2. SEMWG analysis and recommendation for the public consultation

The SEMWG itself proposes an Extended Remittance Information option under change request # 9 which takes in account the change requests # 37, 38, 39, 41, 42 and 43.

Therefore, the SEMWG does not propose a concrete recommendation for the change request # 39 for the public consultation.

The SEMWG looks forward to the comments on the general topic of extended remittance information from the stakeholders taking part in the public consultation.

4.21.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A majority of EPC scheme participants (via national communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that a large majority of the other contributors do support the change request.

In consideration of the overall comments received, the SEMWG considers that the change request # 09 is the best proposal to serve this market need.

The SEMWG proposes not to include this change request but instead the change request # 09 **as an option (option c)** in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Atlas Copco Power and Flow Division Varisco Srl (Italy)	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Bank Association of Slovenia	No - option e - cannot be part of the scheme. We do not have business case.
Benetton Group Srl (Italy)	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.



Contributor	Comments received
Cifin Srl	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
CMB	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Comifar	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Dayco Europe Srl (Italy)	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Dolce & Gabbana Srl	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Dutch Payments Association	See #9.
E.ON Italia SpA	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
equensWorldline	Since change #9 is an optional feature, and this particular point is part of the feature, eWL supports this change as proposed by EACT.
EuroCommerce	Yes - while having the same purpose, structured and unstructured remittance information are used and applied differently. Structured information is key for the straight through processing of remittance information. Originators should be allowed to insert and PSP's to transfer to beneficiaries readable information in the 'unstructured' remittance information.
European Association of Corporate Treasurers (EACT)	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently.



Contributor	Comments received
	<p>The first is essential for Straight Through Processing of remittance information. There is already a Finnish AOS where these info could be both present.</p> <p>Originators should be allowed to insert and PSPs to transfer to beneficiaries human readable information in the "Unstructured" remittance information and, when required or useful, structured remittance information using the ISO 11649 standard for automatic straight through processing reconciliation in the "Structured " remittance information. We agree to cover this CR within CR # 9.</p>
Fagioli SpA	<p>Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.</p>
Fater SpA	<p>Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.</p>
Finance Denmark	<p>No - Finance DK would like to see the result and experience gained following the implementation of CR #09 before considering this CR.</p>
Finance Finland	<p>No - See answer to cr #09.</p>
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	<p>No support, see response to CR #9.</p>
Harmont & Blaine SpA	<p>Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.</p>



Contributor	Comments received
Italian Association of Corporate Treasurers (AITI)	Yes - AITI supports the CR. The structured and unstructured remittance information have same purpose but are used differently. The first is essential for Straight Through Processing of remittance information. There is already a Finnish AOS where these info could be both present. Originators should be allowed to insert and PSPs to transfer to beneficiaries human readable information in the "Unstructured" remittance information and, when required or useful, structured remittance information using the ISO 11649 standard for automatic straight through processing reconciliation in the "Structured " remittance information. AITI agrees to cover this CR within CR # 9.
Italian Banking Association	No - we don't support the CR. We support the CR # 9.
Livanova PLC (Italy)	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Luxembourg Bankers' Association	Yes - cf. CR # 9.
LVT Srl (Italy)	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Nice SpA (Italy)	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Nordea Bank Group	Nordea Bank Group would like to see the result and experience gained following the implementation of CR #09 before considering this CR.
Orafluid Srl	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Pirelli & C. SpA	Yes - we support the CR since the structured and unstructured remittance information have common purpose but are used in different ways. Contemporary presence could facilitate reconciliation.



Contributor	Comments received
Prestofresco SpA (Italy)	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Progeo SCA (Italy)	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
SKF Industrie SpA	Yes - we support the CR. The structured and unstructured remittance information have same purpose but are used differently and contemporary presence could facilitate reconciliation.
Slovak Banking Association	See change request 09.
Stuzza Austria	We don't see a demand and the consequence of the implementation is a huge effort for all involved parties.
Swiss Banking Community	No - cannot be part of the existing scheme – option e - - See answer on # 9.

4.21.4. SMB decision

Not to be included in the 2019 SCT rulebook. Reference is made to the SMB decision for change request item #09 (see section 4.6.4 of this document).



4.22. # 40: Increase the space for the unstructured remittance information

4.22.1. Description

This change request was made by the European Association of Corporate Treasurers (EACT).

The contributor suggests increasing the space in the payment messages for the unstructured remittance information to 280 characters (two recurrences of the xml ISO tag "Ustrd").

Currently both business requirements in the rulebook for Attribute AT-05 - The Remittance Information sent by the Originator to the Beneficiary in the Credit Transfer - and Implementation Guidelines indicate a maximum of 140 characters for unstructured remittance information.

The increased space will allow originators, especially consumers normally not using the structured remittance information, to insert more information for the Beneficiary to identify the items paid and increase the possibility of reconciliation of the payment.

4.22.2. SEMWG analysis and recommendation for the public consultation

The SEMWG recommends not taking forward the change request (**option e**).

The SEMWG members representing national communities reported that currently there is no other market demand to increase the number of characters for unstructured remittance information.

4.22.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A vast majority of EPC scheme participants (via national communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that a vast majority of contributors from a specific business sector do support the change request.

The SEMWG highlights that the maximum number of 140 characters for remittance information is in force since January 2008. The 2018 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 such remittance information.

In consideration of the overall comments received, the SEMWG proposes not to include this change request in the 2019 SCT rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Atlas Copco Power and Flow Division Varisco Srl (Italy)	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.



Contributor	Comments received
Benetton Group Srl (Italy)	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Cifin Srl	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
CMB	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Comifar	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Crown Europe	No - not sure to understand why we can't obtain larger space, ideally no limitation should be made on this specific field.
Dayco Europe Srl (Italy)	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Dolce & Gabbana Srl	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
E.ON Italia SpA	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.



Contributor	Comments received
EuroCommerce	No - EuroCommerce strongly support the inclusion of his change request. The 140 character limit is not long enough to transfer unstructured remittance information to the beneficiary. Unstructured remittance information is mostly used by consumers wishing to share the details of their payments. It is important that the field length can accommodate their requirements.
European Association of Corporate Treasurers (EACT)	No - We support the CR. The actual limit of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Fagioli SpA	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Fater SpA	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Harmont & Blaine SpA	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Italian Association of Corporate Treasurers (AITI)	No - AITI supports the CR. The actual limit of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Livanova PLC (Italy)	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
LVT Srl (Italy)	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.



Contributor	Comments received
Nice SpA (Italy)	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Orafluid Srl	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Pirelli & C. SpA	No - We support the CR since the current number of 140 chr is very limited to allow the originator to send to beneficiary unstructured remittance information and this create obstacles in the reconciliation of remittances. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments to the beneficiary.
Prestofresco SpA (Italy)	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Progeo SCA (Italy)	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
SKF Industrie SpA	No - We support the CR since the current number of 140 chr is very limited to transfer unstructured remittance information to the beneficiary. Unstructured remittance information are mostly used by consumers, willing to communicate the details of their payments.
Stuzza Austria	We don' t see a demand and the consequence of the implementation is a huge effort for all involved parties.
UK Finance	See response to Q9.

4.22.4. SMB decision

Not to be included in the 2019 SCT rulebook.



4.23. # 41: Increase the space for the structured remittance information

4.23.1. Description

This change request was made by the European Association of Corporate Treasurers (EACT).

The contributor suggests inserting an option to increase space in the payment messages for the structured remittance information from a minimum of 2.800 characters (20 occurrences of the xml ISO tag "Strd") to a maximum of 139.860 characters (999 occurrences of the xml ISO tag "Strd").

4.23.2. SEMWG analysis and recommendation for the public consultation

The SEMWG itself proposes an Extended Remittance Information option under change request # 9 which takes in account the change requests # 37, 38, 39, 41, 42 and 43.

Therefore, the SEMWG does not propose a concrete recommendation for the change request # 41 for the public consultation.

The SEMWG looks forward to the comments on the general topic of extended remittance information from the stakeholders taking part in the public consultation.

4.23.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A majority of EPC scheme participants (via national communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that a large majority of the other contributors do support the change request.

In consideration of the overall comments received, the SEMWG considers that the change request # 09 is the best proposal to serve this market need.

The SEMWG proposes not to include this change request but instead the change request # 09 **as an option (option c)** in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Atlas Copco Power and Flow Division Varisco Srl (Italy)	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Bank Association of Slovenia	No - option e - cannot be part of the scheme. We do not have business case.



Contributor	Comments received
Benetton Group Srl (Italy)	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Cifin Srl	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
CMB	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Comifar	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Dayco Europe Srl (Italy)	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Dolce & Gabbana Srl	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Dutch Payments Association	See #9.
E.ON Italia SpA	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
equensWorldline	Since change #9 is an optional feature, and this particular point is part of the feature, eWL supports this change as proposed by EACT.



Contributor	Comments received
EuroCommerce	Yes - EuroCommerce supports the inclusion of this change request. The field length needs to be sufficient to transfer information regarding any supporting documents such as invoice or credit note data, included within the payment, particularly as the relevant ISO standard has no limit.
European Association of Corporate Treasurers (EACT)	Yes - we support the CR. There is already a Finnish AOS in place where space has been extended (999 repetition of the 140chr field). The space should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Fagioli SpA	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Fater SpA	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Finance Denmark	No - Finance DK would like to see the result and experience gained following the implementation of CR #09 before considering this CR.
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	No support, see response to CR #9.
Harmont & Blaine SpA	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Italian Association of Corporate Treasurers (AITI)	Yes - AITI supports the CR. There is already a Finnish AOS in place where space has been extended. The space should be sufficient to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitations in space. AITI agrees to cover this CR within CR # 9.



Contributor	Comments received
Italian Banking Association	No - We don't support the CR. We support the CR # 9.
Livanova PLC (Italy)	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Luxembourg Bankers' Association	Yes - cf. CR #9.
LVT Srl (Italy)	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Nice SpA (Italy)	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Nordea Bank Group	Nordea Bank Group would like to see the result and experience gained following the implementation of CR #09 before considering this CR.
Orafluid Srl	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Pirelli & C. SpA	Yes - we support the CR. The space should be increased to transfer information regarding the invoices /credit notes included in the payment. We agree to include this CR within CR # 9.
Prestofresco SpA (Italy)	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Progeo SCA (Italy)	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.



Contributor	Comments received
SKF Industrie SpA	Yes - we support the CR. The space should be increased to transfer information regarding the documents (e.g. invoices /credit notes) included in the payment. We remind that the ISO standard has no limitation. We agree to cover this CR within CR # 9.
Slovak Banking Association	see change request 09.
Stuzza Austria	We don't see a demand and the consequence of the implementation is a huge effort for all involved parties.
Swiss Banking Community	No - cannot be part of the existing scheme – option e - - See answer on # 9.

4.23.4. SMB decision

Not to be included in the 2019 SCT rulebook. Reference is made to the SMB decision for change request item #09 (see section 4.6.4 of this document).



4.24. # 42: Allow Originator Bank adhered to the Extended Remittance Information option to send both structured and unstructured information to the Beneficiary Bank adhered to the option

4.24.1. Description

This change request was made by the European Association of Corporate Treasurers (EACT).

The contributor suggests allowing the Originator Bank which has adhered to the “Extended Remittance Information” option to send to the Beneficiary Bank also adhered to the option, both structured and unstructured remittance information.

4.24.2. SEMWG analysis and recommendation for the public consultation

The SEMWG itself proposes an Extended Remittance Information option under change request # 9 which takes in account the change requests # 37, 38, 39, 41, 42 and 43.

Therefore, the SEMWG does not propose a concrete recommendation for the change request # 42 for the public consultation.

The SEMWG looks forward to the comments on the general topic of extended remittance information from the stakeholders taking part in the public consultation.

4.24.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A majority of EPC scheme participants (via national communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that a large majority of the other contributors do support the change request.

In consideration of the overall comments received, the SEMWG considers that the change request # 09 is the best proposal to serve this market need.

The SEMWG proposes not to include this change request but instead the change request # 09 **as an option (option c)** in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Atlas Copco Power and Flow Division Varisco Srl (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Bank Association of Slovenia	No - option e - cannot be part of the scheme. We do not have business case.
Benetton Group Srl (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.



Contributor	Comments received
Cifin Srl	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
CMB	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Comifar	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Dayco Europe Srl (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Dolce & Gabbana Srl	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Dutch Payments Association	See #9.
E.ON Italia SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
equensWorldline	Since change #9 is an optional feature, and this particular point is part of the feature, eWL supports this change as proposed by EACT.
European Association of Corporate Treasurers (EACT)	Yes - we support the Cr. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Fagioli SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.



Contributor	Comments received
Fater SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Finance Denmark	No - Finance DK would like to see the result and experience gained following the implementation of CR #09 before considering this CR.
Finance Finland	No - See answer to cr #09.
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	No support, see response to CR #9.
Harmont & Blaine SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Italian Association of Corporate Treasurers (AITI)	Yes - AITI supports the CR since it is functional to the delivery to beneficiary of both structured and unstructured remittance information. AITI agrees to cover this CR within CR # 9.
Italian Banking Association	No - we don't support the CR. We support the CR #9.
Livanova PLC (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Luxembourg Bankers' Association	Yes - cf. CR #9.
LVT Srl (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Nice SpA (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Nordea Bank Group	Nordea Bank Group would like to see the result and experience gained following the implementation of CR #09 before considering this CR.



Contributor	Comments received
Orafluid Srl	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Pirelli & C. SpA	Yes - we support the CR since it is needed for the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Prestofresco SpA (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Progeo SCA (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
SKF Industrie SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Slovak Banking Association	see change request 09.
Stuzza Austria	We don' t see a demand and the consequence of the implementation is a huge effort for all involved parties.
Swiss Banking Community	No - cannot be part of the existing scheme – option e. See answer on # 9.

4.24.4. SMB decision

Not to be included in the 2019 SCT rulebook. Reference is made to the SMB decision for change request item #09 (see section 4.6.4 of this document).



4.25. # 43: Allow Beneficiary Bank adhered to the Extended Remittance Information option to send both structured and unstructured information to the Beneficiary

4.25.1. Description

This change request was made by the European Association of Corporate Treasurers (EACT).

The contributor suggests allowing the Beneficiary Bank that has adhered to the “Extended Remittance Information” option, to send to the Beneficiary both structured and unstructured remittance information.

4.25.2. SEMWG analysis and recommendation for the public consultation

The SEMWG itself proposes an Extended Remittance Information option under change request # 9 which takes in account the change requests # 37, 38, 39, 41, 42 and 43.

Therefore, the SEMWG does not propose a concrete recommendation for the change request # 43 for the public consultation.

The SEMWG looks forward to the comments on the general topic of extended remittance information from the stakeholders taking part in the public consultation.

4.25.3. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A majority of EPC scheme participants (via national communities or via individual comments) do not support that this change request can be part of the scheme. However, it is noted that a large majority of the other contributors do support the change request.

In consideration of the overall comments received, the SEMWG considers that the change request # 09 is the best proposal to serve this market need.

The SEMWG proposes not to include this change request but instead the change request # 09 **as an option (option c)** in the 2019 SCT Rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Atlas Copco Power and Flow Division Varisco Srl (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Bank Association of Slovenia	No - option e - cannot be part of the scheme. We do not have business case.
Benetton Group Srl (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.



Contributor	Comments received
Cifin Srl	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
CMB	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Comifar	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Dayco Europe Srl (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Dolce & Gabbana Srl	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Dutch Payments Association	See #9.
E.ON Italia SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
equensWorldline	Since change #9 is an optional feature, and this particular point is part of the feature, eWL supports this change as proposed by EACT.
European Association of Corporate Treasurers (EACT)	Yes - we support the Cr. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Fagioli SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.



Contributor	Comments received
Fater SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Finance Denmark	No - Finance DK would like to see the result and experience gained following the implementation of CR #09 before considering this CR.
Finance Finland	No - See answer to cr #09.
German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank	No support, see response to CR #9.
Harmont & Blaine SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Italian Association of Corporate Treasurers (AITI)	Yes - AITI supports the CR since it is functional to the delivery to beneficiary of both structured and unstructured remittance information. AITI agrees to cover this CR within CR # 9.
Italian Banking Association	No - we don't support the CR. We support the CR # 9.
Livanova PLC (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Luxembourg Bankers' Association	Yes - cf. CR # 9.
LVT Srl (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Nice SpA (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Nordea Bank Group	Nordea Bank Group would like to see the result and experience gained following the implementation of CR #09 before considering this CR.



Contributor	Comments received
Orafluid Srl	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Pirelli & C. SpA	Yes - We support the CR since it is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to include this CR within CR # 9.
Prestofresco SpA (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Progeo SCA (Italy)	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
SKF Industrie SpA	Yes - we support the CR. It is functional to the delivery to beneficiary of both structured and unstructured remittance information. We agree to cover this CR within CR # 9.
Stuzza Austria	We don' t see a demand and the consequence of the implementation is a huge effort for all involved parties.
Swiss Banking Community	No - Cannot be part of the existing scheme – option e -- See answer on # 9.

4.25.4. SMB decision

Not to be included in the 2019 SCT rulebook. Reference is made to the SMB decision for change request item #09 (see section 4.6.4 of this document).



5. CHANGES PERTAINING TO THE IMPACT OF THE SEPA REGULATION OR OF ANY OTHER EU LEGISLATION (“REGULATORY CHANGE PROPOSAL SUBMISSION DOCUMENT”³)

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.

For this rulebook change management cycle, no changes were deemed required at the start of the public consultation.

During the public consultation itself, no new regulatory and payment scheme oversight matters were brought to the attention of the EPC.

In September 2018, ECB/ Eurosystem finalised its major incident reporting framework for payment schemes and retail payment systems which enters into force on 01 January 2019. Payment schemes (including the EPC SEPA schemes) and retail payment systems are requested to classify and report major payment incidents to their respective lead overseer in accordance with the requirements and definitions in the new framework.

This affects the definition of the term “Major Incident” in each EPC SEPA scheme rulebook. Therefore, the below-mentioned change has a regulatory nature.

Section 4.2.9 of the SMIRs prescribes the procedure for a Change for Regulatory Reasons. This section should be considered as a Regulatory Change Proposal Submission Document. The SEMWG presents a Regulatory Change Proposal in the table below. Given its regulatory nature, this Proposal requires only a review and approval from the SMB.

Section	Description	Reason for change
Change Proposal resulting from the Eurosystem major incident reporting framework for payment schemes and retail payment systems		
7	Complete replacement of the definition of the term “Major Incidents” into: According to the ECB / Eurosystem’s “major incident reporting framework for payment schemes and retail payment systems” (also referred to herein as ‘the Framework’) an incident should be understood as “operational or security incident” in the case of “a singular event or a series of linked events unplanned by ... the scheme’s governance authority which has or will probably have an adverse impact on the integrity, availability, confidentiality, authenticity and/or continuity of payment-related services”.	The EPC as payment scheme owner has to comply with Eurosystem major incident reporting framework for payment schemes and retail payment systems finalised in September 2018.

³ This section 5 contains the so-called Regulatory Change Proposal Submission Document as referred to in Section 4.2.9 of the Scheme Management Internal Rules (SMIRs)



Section	Description	Reason for change
	<p>Incidents that fulfil either one or more criteria at the 'higher impact level' or three or more criteria at the 'lower impact level' should be classified as 'major' according to the Framework. The assessment of materiality of an operational or security incident shall be carried out by the Participant based on the detailed criteria and kept updated by the EPC in document EPC190-18.</p>	



6. CHANGE MANAGEMENT PROCESS IN RESPECT OF MINOR CHANGES

6.1. Publication of list of minor changes

The SEMWG had identified certain minor changes which it considered necessary for the SCT rulebook.

The SEMWG is required under the SMIRs to publish a list of minor changes on the EPC website and to ensure that the list may be viewed by all stakeholders.

This obligation had been met by the publication of the SCT Rulebook 2018 Change Request Public Consultation Document (EPC 005-18) on 13 March 2018, and in particular the provisions under section 4 of that document noting certain changes as 'minor' in this specific document.

6.2. Comments on the minor changes during the public consultation

All stakeholders had the opportunity to submit comments on the list of minor changes covered in the SCT Rulebook 2018 Change Request Public Consultation Document.

No comments on these minor changes had been received out of this public consultation.

6.3. Submission of the list of minor changes to the SMB

The list of minor changes had been submitted to the SMB via this SCT Change Proposal Submission Document in accordance with section 4.2.5 of the SMIRs.

6.4. Minor changes taken up in the SCT rulebook to take effect in 17 November 2019

Section	Description	Reason for change	Type of Change
Section 0.1	The reference [10] should now refer to the document EPC012-17	Instead of a scheme adherence guide per scheme, a single adherence guide for all EPC schemes has been published	CLAR
Section 2.4	2 nd paragraph: extra wording: The payment accounts of the Originator and of the Beneficiary may be in euro or any other currency.	To ensure alignment with the wording in the SCT Inst rulebook.	TYPO
Chapter 7	Include the definition for Payment Account and put this term in capital letters throughout the rulebook.	To ensure alignment with the wording in the SCT Inst rulebook.	TYPO & CLAR



ANNEX I

Comments were received from the following contributors during the public consultation.

Input from:	List of contributors
Individual PSPs and (national) communities of PSPs	<ol style="list-style-type: none">1. Bank Association of Slovenia2. Banking & Payments Federation Ireland3. Dutch Payments Association4. Finance Denmark5. Finance Finland6. French Banking Federation7. German Banking Industry Committee (GBIC) on behalf of the German Banking Community and Deutsche Bundesbank⁴8. Italian Banking Association9. Liechtenstein Bankers Association10. Luxembourg Bankers' Association11. Nordea Bank Group12. Norwegian Banking Community13. OP Financial Group14. Portuguese Banking Community15. Slovak Banking Association16. Spanish Banking Community17. Stuzza Austria18. Swiss Banking Community19. UK Finance

⁴ Represents the following German banking associations:

- Bundesverband der Deutschen Volks- und Raiffeisenbanken e.V. (954 banks)
- Bundesverband deutscher Banken e.V. (125 banks)
- Bundesverband Öffentlicher Banken Deutschlands, VÖB, e.V. (16 banks)
- Deutscher Sparkassen und Giroverband e.V. (396 banks)

and Deutsche Bundesbank



Other stakeholders	<ol style="list-style-type: none">1. Atlas Copco Power and Flow Division Varisco Srl (Italy)2. Benetton Group Srl (Italy)3. Bitkom e.V.4. Cifin Srl5. CMB6. Comifar7. Crown Europe8. Dayco Europe Srl (Italy)9. Dolce & Gabbana Srl10. E.ON Italia SpA11. equensWorldline12. EuroCommerce13. European Association of Corporate Treasurers (EACT)14. Fagioli SpA15. Fater SpA16. Harmont & Blaine SpA17. Italian Association of Corporate Treasurers18. Livanova PLC (Italy)19. LVT Srl (Italy)20. Nice SpA (Italy)21. Orafluid Srl22. Pirelli & C. SpA23. Prestofresco SpA (Italy)24. Progeo SCA (Italy)25. SKF Industrie SpA
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