

**CHANGE PROPOSAL SUBMISSION DOCUMENT  
FOLLOWING THE 2018 PUBLIC CONSULTATION  
ON SDD B2B 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 SDD B2B rulebook to take effect in 17 November 2019. |
| Reason for Issue | Feedback to all stakeholders on the results of the 2018 public consultation  |
| Produced by      | EPC  |
| Circulation      | Publicly available   |



## TABLE OF CONTENTS

### Contents

|       |   |    |
|-------|---|----|
| 1.    | Foreword: The Principles of SEPA Scheme Development   | 3  |
| 1.1.  | EPC rulebook release management - important notice to all SEPA stakeholders   | 3  |
| 1.2.  | SEPA payment scheme development: EPC scheme change management .....   | 3  |
| 2.    | Executive Summary   | 5  |
| 3.    | Overview of change requests submitted for the 2018 public consultation  | 7  |
| 3.1.  | Possible recommendations for a change request.....  | 7  |
| 3.2.  | Summary of change requests and the expressed support following the public consultation .....  | 8  |
| 3.3.  | Summary of changes for inclusion in the next version of the SDD B2B rulebook to be aligned with the SEPA Regulation or with any other relevant EU legislation ..... | 11 |
| 4.    | major change requests details, the related public consultation comments and SEMWG change proposal   | 12 |
| 4.1.  | # 1: Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs) .....   | 12 |
| 4.2.  | # 4: Harmonization of sections 5.7 and 5.8 in Annex VII with the same sections in the rulebook.....   | 14 |
| 4.3.  | # 15: Mandatory use of the acmt.022 message in the interbank space.....   | 15 |
| 4.4.  | # 16: Development of SDD Inst scheme.....   | 17 |
| 4.5.  | # 24: New r-transaction reason code .....   | 19 |
| 4.6.  | # 25: SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries .....  | 21 |
| 4.7.  | # 30: Inclusion of R-transaction reason code ED05.....  | 23 |
| 4.8.  | # 31: Inclusion of R-transaction reason code DT01.....  | 25 |
| 4.9.  | # 32: Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs.....  | 28 |
| 4.10. | # 33: Clarifications on adherence conditions to the optional EPC schemes..  | 29 |
| 4.11. | # 36: Extension of the reversal period for the Creditor.....  | 30 |
| 5.    | Changes pertaining to the impact of the SEPA Regulation or of any other EU Legislation (“Regulatory Change Proposal Submission Document”)                           | 32 |
| 6.    | Change management process in respect of Minor Changes   | 34 |
| 6.1.  | Publication of list of minor changes .....  | 34 |
| 6.2.  | Comments on the minor changes during the public consultation .....  | 34 |
| 6.3.  | Submission of the list of minor changes to the SMB .....  | 34 |
| 6.4.  | Minor changes taken up in the SDD B2B rulebook to take effect in 17 November 2019 .....   | 34 |
|       | Annex I   | 35 |



## **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 22 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 126-18) describes that each stage of the 2018 SDD B2B 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 SDD B2B scheme by any interested party. Deadline for receipt of such suggestions was 31 December 2017. The EPC received **11** change requests for major changes to be introduced into the SDD B2B rulebook.

The public consultation on possible modifications to be introduced into the 2019 SDD B2B 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 SDD B2B Rulebook 2018 Change Request Public Consultation Document (EPC 008-18) and the Response Template (EPC 012-18). 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 SDD B2B rulebook change management process, the SDD B2B rulebook has been updated to include

- A clarification on the obligation for the participants to comply with the mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs);
- Harmonization of sections 5.7 and 5.8 in Annex VII with the same sections in the rulebook;
- A SDD B2B collection containing an IBAN but not the related BIC can be transmitted by the Creditor to the Creditor Bank, even if one of the two SDD B2B scheme participants mentioned in that collection is based in a non-EEA SEPA country;
- ED05 as additional SDD r-transaction reason code related to clearing and settlement-specific issues;
- Regulatory changes in the rulebook sections 5.7 and 5.8 resulting from the Eurosystem oversight assessment exercises on the EPC SEPA payment schemes. These changes impact the rights and obligations of scheme participants but do not affect the operational and business rules of the SDD B2B rulebook.



## **Overview of the 2018 change requests and the final SMB decision**

| <b>Item</b> | <b>Change request title</b>   | <b>SMB decision</b>  |
|-------------|---|--|
| 1           | Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)                      | For inclusion in the 2019 SDD B2B Rulebook version 1.0.      |
| 4           | Harmonization of sections 5.7 and 5.8 in Annex VII with the same sections in the rulebooks                      | For inclusion in the 2019 SDD B2B Rulebook version 1.0.      |
| 15          | Mandatory use of the acmt.022 message in the interbank space  | Not to be included in the 2019 SDD B2B Rulebook version 1.0. |
| 16          | Development of SDD Inst scheme  | Not to be included in the 2019 SDD B2B Rulebook version 1.0. |
| 24          | New r-transaction reason code   | Not to be included in the 2019 SDD B2B Rulebook version 1.0. |
| 25          | SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries                                  | For inclusion in the 2019 SDD B2B Rulebook version 1.0.      |
| 30          | Inclusion of R-transaction reason code ED05   | For inclusion in the 2019 SDD B2B Rulebook version 1.0.      |
| 31          | Inclusion of R-transaction reason code DT01   | Not to be included in the 2019 SDD B2B 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 SDD B2B Rulebook version 1.0. |
| 33          | Clarifications on adherence conditions to the optional EPC schemes  | Not to be included in the 2019 SDD B2B Rulebook version 1.0. |
| 36          | Extension of the reversal period for the Creditor   | Not to be included in the 2019 SDD B2B Rulebook version 1.0. |



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

All change requests to the SDD B2B 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 participant<sup>1</sup> 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 Regulation<sup>2</sup> 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;

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<sup>1</sup> A scheme participant is a PSP which has formally adhered to a SEPA scheme

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



- It 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)                      | <b>Implementation Guidelines</b>                              | Inclusion into the scheme ( <b>option b</b> ) as of Nov 2019 | 14          | 1          | 0                  |
| 4    | Harmonization of sections 5.7 and 5.8 in Annex VII with the same sections in the rulebooks                      | <b>Annex VII e-Mandates</b>                                   | Inclusion into the scheme ( <b>option b</b> ) as of Nov 2019 | 14          | 0          | 1                  |
| 15   | Mandatory use of the acmt.022 message in the interbank space  | <b>Account management messages</b>                            | Cannot be part of the existing scheme – <b>option e</b>      | 14          | 0          | 1                  |
| 16   | Development of SDD Inst scheme  | <b>New SDD scheme</b>   | Cannot be part of the existing scheme – <b>option e</b>      | 14          | 1          | 0                  |
| 24   | New r-transaction reason code   | <b>R-transaction</b>  | Cannot be part of the existing scheme – <b>option e</b>      | 14          | 1          | 0                  |
| 25   | SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries                                  | <b>IBAN-Only for non-EEA SEPA countries</b>                   | Inclusion into the scheme ( <b>option b</b> ) as of Nov 2019 | 14          | 1          | 0                  |
| 30   | Inclusion of R-transaction reason code ED05   | <b>R-transaction</b>  | Inclusion into the scheme ( <b>option b</b> ) as of Nov 2019 | 12          | 2          | 1                  |
| 31   | Inclusion of R-transaction reason code DT01   | <b>R-transaction</b>  | No SEMWG recommendation                                      | 5           | 8          | 2                  |
| 32   | Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs | <b>Interbank IGs: responsibility for usage rule execution</b> | Cannot be part of the existing scheme – <b>option e</b>      | 15          | 0          | 0                  |
| 33   | Clarifications on adherence conditions to the optional EPC schemes  | <b>Optional EPC schemes</b>                                   | Cannot be part of the existing scheme – <b>option e</b>      | 15          | 0          | 0                  |
| 36   | Extension of the reversal period for the Creditor   | <b>Reversal procedure</b>                                     | Cannot be part of the existing scheme – <b>option e</b>      | 14          | 1          | 0                  |



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)                      | <b>Implementation Guidelines</b>                              | Inclusion into the scheme ( <b>option b</b> ) as of Nov 2019 | 3           | 0          | 1                  |
| 4    | Harmonization of sections 5.7 and 5.8 in Annex VII with the same sections in the rulebooks                      | <b>Annex VII e-Mandates</b>                                   | Inclusion into the scheme ( <b>option b</b> ) as of Nov 2019 | 3           | 0          | 1                  |
| 15   | Mandatory use of the acmt.022 message in the interbank space  | <b>Account management messages</b>                            | Cannot be part of the existing scheme – <b>option e</b>      | 3           | 0          | 1                  |
| 16   | Development of SDD Inst scheme  | <b>New SDD scheme</b>   | Cannot be part of the existing scheme – <b>option e</b>      | 2           | 1          | 1                  |
| 24   | New r-transaction reason code   | <b>R-transaction</b>  | Cannot be part of the existing scheme – <b>option e</b>      | 1           | 2          | 1                  |
| 25   | SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries                                  | <b>IBAN-Only for non-EEA SEPA countries</b>                   | Inclusion into the scheme ( <b>option b</b> ) as of Nov 2019 | 4           | 0          | 0                  |
| 30   | Inclusion of R-transaction reason code ED05   | <b>R-transaction</b>  | Inclusion into the scheme ( <b>option b</b> ) as of Nov 2019 | 3           | 0          | 1                  |
| 31   | Inclusion of R-transaction reason code DT01   | <b>R-transaction</b>  | No SEMWG recommendation                                      | 3           | 0          | 1                  |
| 32   | Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs | <b>Interbank IGs: responsibility for usage rule execution</b> | Cannot be part of the existing scheme – <b>option e</b>      | 2           | 1          | 1                  |
| 33   | Clarifications on adherence conditions to the optional EPC schemes  | <b>Optional EPC schemes</b>                                   | Cannot be part of the existing scheme – <b>option e</b>      | 3           | 0          | 1                  |
| 36   | Extension of the reversal period for the Creditor   | <b>Reversal procedure</b>                                     | Cannot be part of the existing scheme – <b>option e</b>      | 3           | 0          | 1                  |



### 3.3. Summary of changes for inclusion in the next version of the SDD B2B 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.<br>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 SDD B2B Rulebook version 1.0.



#### Explicit public consultation comments received

| <b>Contributor</b>                                  | <b>Comments received</b>  |
|---|---|
| European Association of Corporate Treasurers (EACT) | <p>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.</p> <p>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.</p>                            |
| Italian Association of Corporate Treasurers (AITI)  | <p>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.</p> <p>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 chosen in order to align them with the PSD2 legal framework.</p> |

#### **4.1.4. SMB decision**

For inclusion in the 2019 SDD B2B rulebook.



## 4.2. # 4: Harmonization of sections 5.7 and 5.8 in Annex VII with the same sections in the rulebook

### 4.2.1. Description

This change request was made by the SEMWG.

The sections 5.7 (Obligations of a Creditor Bank) and 5.8 (Obligations of a Debtor Bank) of both SDD rulebooks had been extended considerably with regulatory changes during the 2016 rulebook change management cycle.

Chapter 5 in Annex VII on e-Mandates of both SDD rulebooks slightly modifies existing and add new obligations in the sections 5.7 and 5.8 of the concerned SDD rulebook.

A comparison of sections 5.7 and 5.8 in Annex VII with the concerned section in the SDD rulebooks themselves have been done. A number of changes are proposed to ensure alignment.

### 4.2.2. SEMWG analysis and recommendation

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 SDD B2B Rulebook version 1.0.

#### Explicit public consultation comments received

| Contributor | Comments received              |
|-------------|--------------------------------|
| UK Finance  | No opinion - not in use in UK. |

### 4.2.4. SMB decision

For inclusion in the 2019 SDD B2B rulebook.



### 4.3. # 15: Mandatory use of the acmt.022 message in the interbank space

#### 4.3.1. 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”.

#### 4.3.2. 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.

#### 4.3.3. 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 cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2019 SDD B2B 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. |



| Contributor  | Comments received   |
|--|---|
|  | However, This CR makes sense as this message is very useful for the Creditor in case of IBAN change due to the debtor 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.   |

#### 4.3.4. SMB decision

Not to be included in the 2019 SDD B2B rulebook.



#### 4.4. # 16: Development of SDD Inst scheme

##### 4.4.1. Description

This change request was made by Deutsche Bank.

Payees should be able to send via their PSP a SEPA Instant Direct Debit to the payer's PSP. The SDD Inst collection should be sent via the SCT Inst infrastructure from the payee's PSP to the payer's PSP.

##### 4.4.2. SEMWG analysis and recommendation

The SEMWG recommends not taking forward the change request (**option e**) for the SDD Core scheme.

Looking at the use cases proposed in the change request, an alternative for these use cases could be Request-to-Pay messages making use of the SCT and SCT Inst schemes. The topic of Request-to-Pay is handled through the Euro Retail Payments Board (ERPB).

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 must be met:
  - The benefits of the new scheme for payment end users and scheme participants are demonstrated prior to the launch of the development phase;
  - It is demonstrated that enough stakeholders will make use of the new scheme;
  - A cost-benefit analysis is provided;

It complies with the SEPA Regulation or any other relevant Regulation.

##### 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 cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2019 SDD B2B Rulebook version 1.0.

###### Explicit public consultation comments received

| Contributor               | Comments received  |
|---------------------------|--|
| French Banking Federation | Yes - so far, no specific use cases related to a SDD Inst Scheme have been identified in France.<br>Furthermore the development of a SDD B2B Instant doesn't seem consistent with a Customer to Merchant use case. |
| UK Finance                | Yes - support development of Request to Pay.   |



#### **4.4.4. SMB decision**

Not to be included in the 2019 SDD B2B rulebook.



## 4.5. # 24: New r-transaction reason code

### 4.5.1. Description

This change request was made by the Dutch Payments Association.

The SEPA Regulation obliges Debtor Banks to offer Debtors the option to block their account for direct debit transactions in case of four reasons:

- Whitelist in use; creditor and/or mandate not listed;
- Creditor blocked;
- Maximum number of Direct Debit transactions within a certain period is exceeded by the Creditor;
- Transaction exceeds a maximum amount.

Creditors have requested their Creditor Banks to be informed more specific about SDD B2B collections which are returned based on the option, offered by the Debtor Bank, that the transaction exceeds a maximum amount.

This requires a specific reason code (next to SL01 "Due to specific service offered by the Debtor Agent").

Introducing this specific code SL14 will help all parties involved to inform each other in a more accurate way. It also helps Creditors to act/communicate in line with this blocking option as used by the Debtor(s).

| Code | Name   | Definition   |
|------|--|--|
| SL14 | Maximum Direct Debit Transaction Amount exceeded | Due to Maximum allowed Direct Debit Transaction amount service offered by the Debtor Agent |

### 4.5.2. SEMWG analysis and recommendation

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

The Debtor can already rely on other reason codes to block a presented SDD collection (e.g., no mandate, refusal, account blocked for SDD by the Debtor). The Debtor may not be pleased that such SDD r-transaction reason would be communicated directly to the Creditor.

### 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) do not support that this change request can be part of the scheme. However, it is noted that the majority of the other contributors do support the change request.

In consideration of the overall comments received, the SEMWG proposes not to include this change request in the 2019 SDD B2B rulebook version 1.0.



### Explicit public consultation comments received

| <b>Contributor</b>   | <b>Comments received</b>   |
|--|--|
| Dutch Payments Association   | <p>No - we propose option b (no support SEMWG) in order to meet Creditors repeatedly requested needs for more insight in reject reasons. Additional reason codes allow creditors to further automate their internal processes and create a more accurate communication with their Debtors who often have forgotten why and how exactly they have blocked a SDD transaction.</p> <p>In case of national legal privacy restrictions, the debtor bank can still use the existing, more general, reason codes.</p> |
| European Association of Corporate Treasurers (EACT)  | <p>No - introducing further specific codes for these four (optional) settings could help all parties to have specific and useful information regarding r-transactions reasons.</p>   |
| French Banking Federation  | <p>Yes - these 4 new reasons concern specific demands made by the debtor to his bank. These reasons concern the way debtors manage their account and they could disagree to communicate such details to their creditors. That's why we think SL01 is well adapted in these cases.</p>  |
| German Banking Industry Committee (GBIC) on behalf of the German banking community and Deutsche Bundesbank | <p>Yes - however three German scheme participants (= 0,2 %) support the original change request (=option b).</p>   |
| Italian Association of Corporate Treasurers (AITI)   | <p>No - AITI believes that introducing further specific codes for these four (optional) settings could help all parties to have specific and useful information regarding r-transactions reasons and allows straight through processing of r-transaction by the Creditor.</p>  |

#### **4.5.4. SMB decision**

Not to be included in the 2019 SDD B2B rulebook.



#### 4.6. # 25: SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries

##### 4.6.1. 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.

##### 4.6.2. 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.

##### 4.6.3. 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 SDD B2B 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 Debtor's Bank BIC from the Creditor. |



| Contributor | Comments received   |
|-------------|---|
|             | <p>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.</p> <p>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.</p> |
| UK Finance  | Yes - banks do not discriminate between EEA/non when using BIC from IBAN derivation service, but this can affect compliance with WTR. BIC can be required in these circumstances.   |

#### 4.6.4. SMB decision

For inclusion in the 2019 SDD B2B rulebook.



## 4.7. # 30: Inclusion of R-transaction reason code ED05

### 4.7.1. 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 reason code ED05 (= "Settlement of the transaction has failed").

It can be in the interest of a bank (and its customers) involved to enable the creditor agent to distinguish between a reject due to lack of funds on the debtor's account, and a reject due to settlement failure on interbank level. The code ED05 can provide a clear distinction between these scenarios, preventing any possible association between the code and the financial status of the debtor.

The contributor points out that some SEPA countries have legal provisions that for a reject due to a lack of funds on the debtor's account, the code AM04 is not allowed and MS03 must be used instead. If ED05 is not allowed in the pacs.002 message, MS03 will be used in both scenarios, inducing the risk of misinterpretation

A creditor bank may consider a different handling of ED05-rejections, e.g., resubmit the transactions to the CSM instead of forwarding the reject to its customers.

Furthermore, it is not only a CSM who might want to actively use ED05 in pacs.002 messages, but also a bank connecting other banks as indirect participants / reachable parties to a CSM. It can also find itself in the situation that it wants to reject an SDD collection in case it is not able to successfully debit its indirect participant. ED05 would be the appropriate code in this case for the same reasons as described above.

### 4.7.2. SEMWG analysis and recommendation

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

This provides clarity on the concrete reason of an unsuccessfully executed SDD collection to the Creditor Bank.

### 4.7.3. 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 SDD B2B Rulebook version 1.0.



#### Explicit public consultation comments received

| <b>Contributor</b>         | <b>Comments received</b>  |
|----------------------------|---|
| Dutch Payments Association | No - we want to prevent that information about failed settlement is directly communicated to creditors. This is information that can have serious reputational risk for PSPs.   |
| 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. |

#### **4.7.4. SMB decision**

For inclusion in the 2019 SDD B2B rulebook.



## 4.8. # 31: Inclusion of R-transaction reason code DT01

### 4.8.1. 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 reason code DT01 (= "Invalid date e.g. wrong or missing settlement date"). This reason code should be added to the pacs.002 and pain.002, in SDD, for rejecting a wrong date such as wrong Interbank Settlement Date, Requested Collection Date, Original Interbank Settlement Date, or a date outside the allowed period for an R-transaction.

DT01 is more specific than MS03 (= Reason not specified) and FF01 (invalid file format), which are currently being used in SDD (TM01 in SCT).

### 4.8.2. SEMWG analysis and recommendation

The SEMWG does not give a recommendation for this change request.

This reason code is not yet foreseen in the SDD interbank IGs. More information on the use cases is needed to re-consider the possible inclusion of this reason code.

### 4.8.3. 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 wish to take up this change request in the scheme.

However, it is noted that the other contributors do support the change request.

In consideration of the overall comments received, the SEMWG proposes not to include this change request in the 2019 SDD B2B rulebook version 1.0.

#### Explicit public consultation comments received

| Contributor                  | Comments received  |
|------------------------------|--|
| Bank Association of Slovenia | Not seen as a problem, no new code is needed.  |
| Bitkom e.V.                  | No opinion.  |
| Dutch Payments Association   | We propose option d.<br>The change request is not considered fit for SEPA wide use and could be handled as an additional optional service (AOS) by interested communities. |
| equensWorldline              | Option b: inclusion in the scheme.   |



| Contributor  | Comments received  |
|--|--|
| European Association of Corporate Treasurers (EACT)  | Introducing a code could help all parties to have specific and useful information regarding r-transactions reasons.  |
| Finance Denmark  | NO -We cannot see the benefit of such development compared to the cost of change.  |
| Finance Finland  | Option b: inclusion in the scheme.<br>More specified reason code may help in investigations.   |
| French Banking Federation  | 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.  |
| German Banking Industry Committee (GBIC) on behalf of the German banking community and Deutsche Bundesbank | NO OPINION supported by a majority of 1445 German scheme participants (= 99,8 %)."<br>However three German scheme participants (= 0,2 %) support the original change request (= option b) and provide the following comment:<br>„DT01 (= “Invalid date e.g. wrong or missing settlement date”). To be added to the pacs.002 and pain.002, in SDD, for rejecting a wrong date (too late, too early, not possible, ...), such as wrong Interbank Settlement Date, Requested Collection Date, Original Interbank Settlement Date, or a date outside the allowed period for an R-transaction.” |
| Italian Association of Corporate Treasurers (AITI)   | AITI believes that introducing a further code could help all parties to have specific and useful information regarding r-transactions reasons.   |
| Italian Banking Association  | More information/use cases are needed to re-consider the inclusion of R-transaction reason code DT01.  |
| Luxembourg Bankers' Association  | We do not support this CR because it implies manual intervention.  |
| Nordea Bank Group  | NO - The Nordea Bank Group cannot see the benefit of such development compared to the cost of change.  |
| Norwegian Banking Community  | Supports use of reason codes that should cover all SEPA schemes. Giving precise response that enables automated correction/update of information. Related to the CR, we support use of DT01 for invalid date to enable more precise response.  |
| Portuguese Banking Community   | Option e: cannot be part of the scheme.<br>The PT Community does not support, as this inclusion does not have Cost-Benefit business case.  |
| Spanish Banking Community  | No need for further codes that should not reach the debtor side if due to a interbank space mistake error.   |



| <b>Contributor</b>      | <b>Comments received</b>  |
|-------------------------|---|
| Stuzza Austria          | Option b: inclusion in the scheme.                              |
| Swiss banking community | Option b: inclusion in the scheme.                              |
| UK Finance              | UK community are in favour as it would support greater clarity. |

#### **4.8.4. SMB decision**

Not to be included in the 2019 SDD B2B rulebook.



#### **4.9. # 32: Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs**

##### **4.9.1. 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).

##### **4.9.2. 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.

##### **4.9.3. 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 SDD B2B Rulebook version 1.0.

###### Explicit public consultation comments received

No explicit comment has been submitted.

##### **4.9.4. SMB decision**

Not to be included in the 2019 SDD B2B rulebook.



## 4.10. # 33: Clarifications on adherence conditions to the optional EPC schemes

### 4.10.1. Description

This change request was made by equensWorldline.

The SDD B2B scheme is an optional scheme. Currently, PSPs are not obliged by law, national or any EU regulation to offer payments following this payment scheme. However, in the rulebook there is no clear statement whether the adherence to the SDD Core scheme is a precondition for the adherence to the SDD B2B scheme.

Until now, payment service providers had adhered to the “basic schemes” (SCT and SDD Core) and afterwards some had adhered optionally to the SDD B2B scheme. In the future, it is possible for some payment service providers to decide strategically to offer exclusively SDD B2B collection services (or SCT Inst services). The payment service providers should be provided with clarity about the adherence of these schemes.

The document “Guide for Adherence to the SEPA Credit Transfer Scheme, the SEPA Instant Credit Transfer Scheme and the SEPA Direct Debit Schemes”, (EPC012-17 v.1.0) does neither provide the clarity whether a participant can offer exclusively optional SEPA schemes and not “core” schemes to the market.

Therefore, the contributor suggests that the SDD B2B rulebook must include a clear statement regarding the above-mentioned possibility. Alternatively, a reference to the Guide Adherence could help, if the clarification is made in the guide adherence instead.

### 4.10.2. SEMWG analysis and recommendation

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

There are four independent schemes and they do not have any relation or dependency to each other.

### 4.10.3. 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 SDD B2B Rulebook version 1.0.

#### Explicit public consultation comments received

No explicit comment has been submitted.

### 4.10.4. SMB decision

Not to be included in the 2019 SDD B2B rulebook.



## 4.11. # 36: Extension of the reversal period for the Creditor

### 4.11.1. Description

This change request was made by the Spanish banking community.

Both SDD rulebooks state that Reversals may only be processed from the settlement date and within the five inter-bank business days following the due date requested in the original collection.

After these five days, the Reversal need to be processed out of the automated procedure, forcing both the Debtor Bank and the Creditor Bank to act manually to get the direct debit reversals, wasting time and resources.

The contributor proposes to extend the reversal period for the Creditor from the current five days to ten inter-bank business days, as the experience in the Spanish community is that there are up to 5% of reversals requested by the Creditor after the fifth day.

### 4.11.2. SEMWG analysis and recommendation

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

The need to do a reversal is due to an error by the Creditor. Extending the timespan to 10 days in which a reversal can be done will cause conflicts with other r-transaction types. It is expected that the Creditor rectifies its error as soon as possible. The Creditor may agree with the Debtor to recover the funds outside of the scheme (e.g., by credit transfer).

### 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 cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2019 SDD B2B Rulebook version 1.0.

#### Explicit public consultation comments received

| Contributor  | Comments received   |
|--|---|
| 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).  |
| Spanish Banking Community  | No - option b. After these five days, the reversal need to be processed out of the automated procedure, forcing both debtor bank and the creditor bank to act manually in order to get the direct debits reversals, wasting time and resources. |



#### **4.11.4. SMB decision**

Not to be included in the 2019 SDD B2B rulebook.



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

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, a payment scheme oversight matter was brought to the attention of the EPC. Following the Eurosystem oversight assessment exercises conducted on the EPC SEPA payment schemes, a discrepancy was noted in the SDD B2B scheme rulebook compared to the SCT and the SCT Inst rulebooks.

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 changes have 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 Regulatory Change Proposals in the table below. Given their regulatory nature, these Proposals require only a review and approval from the SMB.

| Section  | Description   | Reason for change  |
|--|---|--|
| <b>Change Proposals resulting from the Eurosystem oversight assessment exercises on the EPC SEPA payment schemes</b> |   |  |
| 5.7  | In respect of each of its Creditors, a Creditor Bank shall: (...) <ul style="list-style-type: none"><li>• comply with applicable <b>principles provisions</b> issued from time to time in relation to risk management as set out in the Rulebook and Annex II</li></ul> | The section 5.7 of the 2017 SCT and SCT Inst rulebook already specify “provisions” instead of “principles” with respect to risk management.<br><br>The term “provisions” has been inserted following a Eurosystem oversight assessment exercise on one EPC payment scheme. |

<sup>3</sup> 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   |
|--|--|---|
| 5.8  | <p>In respect of each of its Debtors, a Debtor Bank shall: (...)</p> <ul style="list-style-type: none"> <li>comply with applicable <del>principles</del> <b>provisions</b> issued from time to time in relation to risk management as set out in the Rulebook and Annex II</li> </ul>  | <p>The section 5.8 of the 2017 SCT and SCT Inst rulebook already specify “provisions” instead of “principles” with respect to risk management.</p> <p>The term “provisions” has been inserted following a Eurosystem oversight assessment exercise on one EPC payment scheme.</p> |
| <b>Change Proposal resulting from the Eurosystem major incident reporting framework for payment schemes and retail payment systems</b> |  |   |
| 7  | <p>Complete replacement of the definition of the term “Major Incidents” into:</p> <p>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”.</p> <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> | <p>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.</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 SDD B2B 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 SDD B2B Rulebook 2018 Change Request Public Consultation Document (EPC 008-18) 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 SDD B2B 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 SDD B2B Change Proposal Submission Document in accordance with section 4.2.5 of the SMIRs.

### **6.4. Minor changes taken up in the SDD B2B rulebook to take effect in 17 November 2019**

| <b>Section</b>     | <b>Description</b>  | <b>Reason for change</b>  | <b>Type of Change</b> |
|--------------------|---|---|-----------------------|
| <b>Section 0.1</b> | The reference [13] 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                  |



## **ANNEX I**

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

| <b>Input from:</b>  | <b>List of contributors</b>  |
|---|--|
| <b>Individual PSPs and (national) communities of PSPs</b> | <ol style="list-style-type: none"><li>1. Bank Association of Slovenia</li><li>2. Dutch Payments Association</li><li>3. Finance Denmark</li><li>4. Finance Finland</li><li>5. French Banking Federation</li><li>6. German Banking Industry Committee (GBIC) on behalf of the German banking community and Deutsche Bundesbank<sup>4</sup></li><li>7. Italian Banking Association</li><li>8. Luxembourg Bankers' Association</li><li>9. Nordea Bank Group</li><li>10. Norwegian Banking Community</li><li>11. Portuguese Banking Community</li><li>12. Spanish Banking Community</li><li>13. Stuzza Austria</li><li>14. Swiss banking community</li><li>15. UK Finance</li></ol> |
| <b>Other stakeholders</b>                                 | <ol style="list-style-type: none"><li>1. Bitkom e.V.</li><li>2. equensWorldline</li><li>3. European Association of Corporate Treasurers (EACT)</li><li>4. Italian Association of Corporate Treasurers (AITI)</li></ol>   |

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<sup>4</sup> 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