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POSITION OF THE SCHEME END-USER FORUM (SEUF)

2018 SEMWG CHANGE PROPOSALS FOR THE EPC SEPA SCHEME RULEBOOKS

1. Background

All submitted change requests to modify the EPC SEPA rulebooks during the 2018 EPC SEPA Scheme Change Management Cycle had been published for a three-month public consultation in the second quarter of the 2018.

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

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

The SEMWG consolidated its change proposals, along with each change request and the related non-confidential comments received from the contributors during the public consultation, in a Change Proposal Submission Document per EPC SEPA scheme rulebook:

- EPC 122-18 v0.3 for the SEPA Credit Transfer (SCT) rulebook
- EPC 124-18 v0.3 for the SEPA Instant Credit Transfer (SCT Inst) rulebook
- EPC 125-18 v0.3 for the SEPA Direct Debit (SDD) Core rulebook
- EPC 126-18 v0.3 for the SDD Business-to-Business (B2B) rulebook

The above-mentioned versions of the Change Proposal Submission Documents were then submitted to the August 2018 meetings of the Scheme End-User Forum (SEUF) and the EPC Scheme Technical Forum (ESTF) (i.e. the EPC Stakeholder Fora) and to the September 2018 meeting of the EPC Scheme Management Board (SMB).

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

Section 4.4 of the EPC Scheme Management Internal Rules (SMIRs) indicates that the SEUF and the ESTF each separately are invited to provide their consolidated comments in a position document on the change requests and on the related change proposals outlined in the Change Proposal Submission Documents. Their respective position documents will be communicated to the SMB.

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

This SEUF position document will be published on the EPC Website together with the final versions of the Change Proposal Submission Documents which will include the decision of the SMB on each Change Proposal.



3. SEUF position on the 2018 SEMWG Change Proposals for the SCT Rulebook

Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
1	Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	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. For inclusion in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal.
2	Changes to the Recall procedure	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. For inclusion in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal.
3	Changes to the 'Request for Recall by the Originator' (RFRO) procedure	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. For inclusion in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal.
7	Extra reasons for the response to a SCT Inquiry	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. For inclusion in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal.
8	Editorial restructuring of the rulebook sections on SCT rulebook processing flows	The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public consultation	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2019 SCT Rulebook version 1.0.	
9	Inclusion of Extended Remittance Information (ERI) option	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. For inclusion <u>as an option within the scheme (option c)</u> in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal.
10	Change request withdrawn.		
11	Change request withdrawn.		
15	Mandatory use of the acmt.022 message in the interbank space	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. Not to be included in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal.
17	Addition of a Repayment service	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.	Does not support the SEMWG proposal. The SEUF supports the inclusion of the Repayment concept in the SCT scheme but believes the SCT rulebook itself should formally describe the Repayment through business rules and datasets. In addition, the SEUF demands that the Repayment attributes allow



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>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.</p> <p>Not to be included in the 2019 SCT Rulebook version 1.0.</p>	<p>the Beneficiary and the Originator to do an easy reconciliation between the Repayment and the original SCT transaction. The rulebook specifications for the SCT Recall process are a good example.</p>
18	Extension response deadline for Beneficiary Banks to a Request for Recall by the Originator (RFRO)	<p>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.</p> <p>For inclusion in the 2019 SCT Rulebook version 1.0 for the RFRO and the Recall procedures.</p>	Supports the SEMWG Change Proposal.
19	Possibility for the Originator to request Beneficiary details following a negative answer to a Request for Recall by the Originator (RFRO)	<p>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.</p> <p>Not to be included in the 2019 SCT rulebook version 1.0.</p>	Supports the SEMWG Change Proposal. The SEUF nevertheless comments that obtaining details about the Beneficiary remains an issue.
25	SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries	<p>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.</p> <p>For inclusion in the 2019 SCT Rulebook version 1.0.</p>	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
27	Inclusion of incoming One-Leg Out euro credit transfers	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. Not to be included in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal. The SEUF nevertheless recommends that the EPC does a thorough analysis on this topic and keep the SEUF informed about the future developments.
28	Inclusion of R-transaction reason code ED05	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. For inclusion in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal.
29	inclusion of R-transaction reason code CNOR	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. For inclusion in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal.
32	Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs	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. Not to be included in the 2019 SCT Rulebook version 1.0.	Supports the SEMWG Change Proposal.
35	Extension of the period for the Originator Bank to submit a Recall request	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	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		change request cannot be part of the scheme. 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	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.	Supports the SEMWG Change Proposal.
38	Amendment in business requirements for Attribute AT-05 - The Remittance Information	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.	Supports the SEMWG Change Proposal.
39	Option to allow contemporaneous presence of unstructured and structured remittance information	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	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>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.</p>	
40	Increase the space for the unstructured remittance information	<p>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.</p> <p>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 <u>and</u> consumers share a similar need for a higher maximum number of characters for such remittance information.</p> <p>Not to be included in the 2019 SCT rulebook version 1.0.</p>	<p>Does not support the SEMWG proposal. Even though the SEUF notes that other business sectors and consumers have not expressed a similar need for a higher maximum number of characters for such remittance information, the SEUF still considers that the current available number of characters for such remittance information is too low. Customers may want to transmit much more information together with the SCT instruction but are unable to do this right now.</p>
41	Increase the space for the structured remittance information	<p>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</p>	<p>Supports the SEMWG Change Proposal.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<u>an option (option c) in the 2019 SCT Rulebook version 1.0.</u>	
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	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 <u>as an option (option c) in the 2019 SCT Rulebook version 1.0.</u>	Supports the SEMWG Change Proposal.
43	Allow Beneficiary Bank adhered to the Extended Remittance Information option to send both structured and unstructured information to the Beneficiary	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 <u>as an option (option c) in the 2019 SCT Rulebook version 1.0.</u>	Supports the SEMWG Change Proposal.



4. SEUF position on the 2018 SEMWG Change Proposals for the SCT Inst Rulebook

Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
1	Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	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. For inclusion in the 2019 SCT Inst Rulebook version 1.0.	Supports the SEMWG Change Proposal.
2	Changes to the Recall procedure	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. For inclusion in the 2019 SCT Inst Rulebook version 1.0.	Supports the SEMWG Change Proposal.
3	Changes to the 'Request for Recall by the Originator' (RFRO) procedure	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. For inclusion in the 2019 SCT Inst Rulebook version 1.0.	Supports the SEMWG Change Proposal.
5	Extra SCT Inst option on the hard time-out deadline	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. For inclusion in the 2019 SCT Inst Rulebook version 1.0.	Supports the SEMWG Change Proposal.
6	Rewording in section 2.5 on value limits (SCT Inst Instruction vs SCT Inst Transaction)	The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2019 SCT Inst Rulebook version 1.0.	
13	Resolution of SCT Inst investigations within 2 hours after Time Stamp	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. Not to be included in the 2019 SCT Inst Rulebook version 1.0.	Supports the SEMWG Change Proposal.
14	Use of labelled -Duplicate- SCT Inst Transaction message in case of no confirmation message for the initial SCT Inst Transaction	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. Not to be included in the 2019 SCT Inst Rulebook version 1.0.	Supports the SEMWG Change Proposal.
17	Addition of a Repayment service	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 Inst Rulebook version 1.0 itself (option a). A Repayment is technically considered as a new SCT Inst transaction.	Does not support the SEMWG proposal. The SEUF supports the inclusion of the Repayment concept in the SCT Inst scheme but believes the SCT Inst rulebook itself should formally describe the Repayment through business rules and datasets. In addition, the SEUF demands that the



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		<p>The SEMWG proposes to include usage rules in the Customer-to-Bank IGs for electronically bundled SCT Inst transactions in ISO 20022 XML format when the Beneficiary wants to initiate a Repayment for an earlier settled SCT Inst 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 Inst transaction.</p> <p>Not to be included in the 2019 SCT Inst Rulebook version 1.0.</p>	<p>Repayment attributes allow the Beneficiary and the Originator to do an easy reconciliation between the Repayment and the original SCT Inst transaction. The rulebook specifications for the SCT Inst Recall process are a good example.</p>
20	Extension response deadline for Beneficiary Banks to a Request for Recall by the Originator (RFRO)	<p>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.</p> <p>For inclusion in the 2019 SCT Inst Rulebook version 1.0 for the RFRO <u>and</u> the Recall procedures.</p>	<p>Supports the SEMWG Change Proposal.</p>
21	Possibility for the Originator to request Beneficiary details following a negative answer to a Request for Recall by the Originator (RFRO)	<p>The vast majority of EPC scheme participants (via national communities or via individual comments) and a majority of other contributors to the 2018 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.</p> <p>Not to be included in the 2019 SCT Inst Rulebook version 1.0.</p>	<p>Supports the SEMWG Change Proposal. The SEUF nevertheless comments that obtaining details about the Beneficiary remains an issue.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
22	Procedure for handling hits due to CTF, Embargo and AML	<p>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.</p> <p>Not to be included in the 2019 SCT Inst Rulebook version 1.0.</p>	Supports the SEMWG Change Proposal.
25	SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries	<p>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.</p> <p>For inclusion in the 2019 SCT Inst Rulebook version 1.0.</p>	Supports the SEMWG Change Proposal.
26	Inclusion of SCT Inst Return procedure	<p>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.</p> <p>Not to be included in the 2019 SCT Inst Rulebook version 1.0.</p>	Supports the SEMWG Change Proposal.
33	Clarifications on adherence conditions to the optional EPC schemes	<p>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.</p> <p>Not to be included in the 2019 SCT Inst Rulebook version 1.0.</p>	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
34	Use of aliases when making SCT Inst Instructions	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. Not to be included in the 2019 SCT Inst Rulebook version 1.0.	Supports the SEMWG Change Proposal.



5. SEUF position on the 2018 SEMWG Change Proposals for the SDD Core Rulebook

Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
1	Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	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. For inclusion in the 2019 SDD Core Rulebook version 1.0.	Supports the SEMWG Change Proposal.
4	Harmonization of sections 5.7 and 5.8 in Annex VII with the same sections in the rulebooks	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. For inclusion in the 2019 SDD Core Rulebook version 1.0.	Supports the SEMWG Change Proposal.
12	Change in the calculation of the compensation for the Debtor Bank in case of Refunds	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. Not to be included in the 2019 SDD Core Rulebook version 1.0.	Supports the SEMWG Change Proposal.
15	Mandatory use of the acmt.022 message in the interbank space	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. Not to be included in the 2019 SDD Core Rulebook version 1.0.	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
16	Development of SDD Inst scheme	<p>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.</p> <p>Not to be included in the 2019 SDD Core Rulebook version 1.0.</p>	Supports the SEMWG Change Proposal.
23	New r-transaction reason codes	<p>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 the other contributors do support the change request.</p> <p>Not to be included in the 2019 SDD Core rulebook version 1.0.</p>	Does not support the SEMWG proposal. The code SL01 covers multiple reasons which the Debtor can use under the SEPA Regulation to block their account for direct debit collections. The lack of a unique r-transaction reason code for each reason permitted by the SEPA Regulation prevents the Creditor to develop highly automated follow-up processes for these failed collections internally and with the Debtor. The inclusion of the requested reason codes would foster a symmetry of information sharing between the SDD scheme participants and their respective customers.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
25	SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries	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. For inclusion in the 2019 SDD Core Rulebook version 1.0.	Supports the SEMWG Change Proposal.
30	Inclusion of R-transaction reason code ED05	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. For inclusion in the 2019 SDD Core Rulebook version 1.0.	Supports the SEMWG Change Proposal.
31	Inclusion of R-transaction reason code DT01	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. Not to be included in the 2019 SDD Core rulebook version 1.0.	Supports the SEMWG Change Proposal.
32	Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs	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. Not to be included in the 2019 SDD Core Rulebook version 1.0.	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
36	Extension of the reversal period for the Creditor	<p>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.</p> <p>Not to be included in the 2019 SDD Core rulebook version 1.0.</p>	Supports the SEMWG Change Proposal.



6. SEUF position on the 2018 SEMWG Change Proposals for the SDD B2B Rulebook

Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
1	Rulebook clarification to Mandatory Customer-to-Bank (C2B) Implementation Guidelines (IGs)	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. For inclusion in the 2019 SDD B2B Rulebook version 1.0.	Supports the SEMWG Change Proposal.
4	Harmonization of sections 5.7 and 5.8 in Annex VII with the same sections in the rulebooks	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. For inclusion in the 2019 SDD B2B Rulebook version 1.0.	Supports the SEMWG Change Proposal.
15	Mandatory use of the acmt.022 message in the interbank space	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. Not to be included in the 2019 SDD B2B Rulebook version 1.0.	Supports the SEMWG Change Proposal.
16	Development of SDD Inst scheme	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. Not to be included in the 2019 SDD B2B Rulebook version 1.0.	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
24	New r-transaction reason code	<p>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.</p> <p>Not to be included in the 2019 SDD B2B rulebook version 1.0.</p>	<p>Does not support the SEMWG proposal. The code SL01 covers multiple reasons which the Debtor can use under the SEPA Regulation to block their account for direct debit collections. The lack of a unique r-transaction reason code for each reason permitted by the SEPA Regulation prevents the Creditor to develop highly automated follow-up processes for these failed collections internally and with the Debtor. The inclusion of the requested reason codes would foster a symmetry of information sharing between the SDD scheme participants and their respective customers.</p>
25	SEPA transaction processing based on IBAN-Only also for non-EEA SEPA countries	<p>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.</p> <p>For inclusion in the 2019 SDD B2B Rulebook version 1.0.</p>	<p>Supports the SEMWG Change Proposal.</p>
30	Inclusion of R-transaction reason code ED05	<p>The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2018 public</p>	<p>Supports the SEMWG Change Proposal.</p>



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		consultation supported the SEMWG recommendation that this change request can be part of the scheme. For inclusion in the 2019 SDD B2B Rulebook version 1.0.	
31	Inclusion of R-transaction reason code DT01	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. Not to be included in the 2019 SDD B2B rulebook version 1.0.	Supports the SEMWG Change Proposal.
32	Clear validation responsibilities to participants and CSMs to execute the SEPA Usage Rules in the interbank IGs	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. Not to be included in the 2019 SDD B2B Rulebook version 1.0.	Supports the SEMWG Change Proposal.
33	Clarifications on adherence conditions to the optional EPC schemes	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. Not to be included in the 2019 SDD B2B Rulebook version 1.0.	Supports the SEMWG Change Proposal.
36	Extension of the reversal period for the Creditor	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.	Supports the SEMWG Change Proposal.



Item	Change request title	EPC SEMWG Change Proposal	SEUF Position
		Not to be included in the 2019 SDD B2B Rulebook version 1.0.	