**Approved minutes of the meeting of**

**EPC Multi-Stakeholder Group on EIPP (EIPP MSG)**

**held on 20 March 2019 in the EPC premises in Brussels**

Distribution: EIPP MSG

**Restricted: Yes**

1. **Introduction, presentation of the agenda**

This was the 3rd meeting of the EIPP MSG in 2019, held in the EPC premises in Brussels.

The attendance to this meeting can be found in the Annex 1 at the end of these minutes. M. Gillis and D. Berger attended via Skype for Business.

The participants presented themselves in a brief “tour de table”, and Ivana Gargiulo was welcomed for her first presence to the Group’s meetings.

The agenda was approved without modifications.

1. **Review and approval of the previous meeting’s minutes**

The minutes of the previous meeting (20 February 2019) were proposed for approval and some changes were required by the co-chairs.

During the review of the minutes, J. Vanhautère elaborated on the question whether there is a need for a message for Payer enrolment with the slide 5 of the presentation EIPP servicing messages V2 – animation.pptx in support. A message for the enrolment of Payers may be useful in B2B contexts. In this case the message from the Payer EIPP Provider to the Directory Provider and its response would be standardised and the message from the Payer to its EIPP Provider would be optional.

The discussion derived to the Payee “visibility” aspect. M. Battistella considered this aspect important and provided an explanation, based on the last year work. It has been highlighted that “visibility” is not the same as “reachability”. There is an analogy with the phone directories: a phone number is reachable but not necessarily published in the directories. In the EIPP eco-system a Payee may not be visible via searches in the Directories but still be reachable for messages if the sender knows his EIPP provider address.

V. Kuntz mentioned more complex cases of limited visibility, e.g. per country or category but it has been agreed that only the general visibility should be retained. Also, V. Kuntz pointed out the need for a contract reference or any other type of reference helping the Payee to link the sending Payer to a customer in its internal customer base.

J. Vanhautère confirmed that it is the case and this specific need for contract reference was stated in the slide 7 (*nota bene*) for reconciliation purpose at payee level.

Related to the visibility P. Spittler considers that it is not the best term for the concept it covers.

After these discussions the minutes were corrected and approved.

1. **Workshop on servicing messages : detailing the activities per actor**

A switch in the agenda has been agreed: the point 4.1 started to be discussed instead of point 3.

Discussion on the activation by the Payee

In the introduction, J. Vanhautère provided an input from the EPC EIPP mirroring Task-Force (TF) after its last call. The TF’s point of view is that, even though until now only the activation by the Payer has been foreseen and detailed, the activation initiated by the Payee is also needed. Therefore, the design of the activation message should take into account this 2nd flow of activation. This request is narrowly linked to the above-mentioned visibility aspect. The TF considers that if a Payee is not visible in the EIPP eco-system, the activation of the EIPP service between a Payer and this Payee can be done only at the initiative of the Payee because the Payer doesn’t know the eco-system Payee’s EIPP Provider address. On the other hand, an activation involving a visible Payee can be done in both directions: Payer to Payee or Payee to Payer.

In support, J. Vanhautère presented the slide 6 of the presentation mentioned above where the activation by the Payee is illustrated in the flow 1’-2’-3’ and the respective responses.

M. Battistella didn’t agree with the proposal to design a message also for the activation by the Payee that should reach the EIPP Service Provider of the Payer.

P. Spittler pointed out that in any case the EIPP service between the Payer and Payee needs a contractual relation.

M. Battistella explained that for the sake of not adding complexity this flow shouldn’t be in the scope. He highlighted similarities with the mandates for Direct Debits where CMF and DMF models had existed until the CMF was retained for SDD. Moreover, the agreement to use e-invoices concerns the debtor and its biller (Creditor/Payee) and not the PSP of the Payee and there is no need to involve the Payer’s EIPP Service Provider in this aspect in case of activation by the Payee.

S. Elfstrand proposed to move on with the activation by the Payer and keep in mind that there is room for improvement in the future. J. Vanhautère proposed to create the messages in an approach open for the activation by the Payee in addition to the one forecasted by the Payer.

M. Battistella reminded the perimeter of the mandate and the conclusions of the last year work: only enrolment and activation by the Payer were on the table. P. Spittler wonderer what is the impact on the standards.

J. Vanhautère reminded the need for consent, included in the EU directive on e-invoicing. On the consent, S. Elfstrand considered that the payment could represent the consent. M. Battistella reminded that the consent to receive e-invoices remains in the customer (payer) to supplier (payee) relationship.

P. Spittler asked what the opinion of the regulators is, i.e. questioning B. Darrius (Banque de France) on the consent. B. Darrius admitted that the consent is necessary and concerning the relation Payer-Provider links with GDPR could be identified.

J. Vanhautère asked the opinion of the members whether the first RTP could be sufficient to transport the request for consent from the Payee to Payer and the acceptation of this RTP could mean the consent is given to this payee by the payer, otherwise a dedicated code for RTP receiving refusal had to be foreseen in the Pain014.

M. Battistella came back to the idea that the activation by the Payee should be out of the scheme and the 1st RTP/e-invoice could indeed eventually indicate that the co consent/activation was previously obtained.

P. Spittler asked other members on the current practices. D. Berger responded that in the Swiss solution there was no activation by the Payee in the old solution but it does exist in the new one. I. Gargiulo also replied that in the CBI’s solution there is no activation by the Payee.

M. Battistella pointed out that to protect the Payer against unexpected RTPs, the PSP of the Payer could classify the RTPs and accept only those that come after activations performed by the Payer. In addition, the Payer could be requested to enter in the activation request a unique code received out of the scheme from the Payee in order to activate the service towards a nonvisible payee.

J. Vanhautère pointed out an issue with the rejections of the first RTPs by the Payer. This could mean the rejection of the e-invoice (amount, etc) or the rejection of the service itself.

J. Vanhautère proposed to move on with enrolment and activation by the Payer and to leave the activation by the Payee for the public consultation. If it will be required in consultation answers from some countries/communities, it will be included in the design. He proposed to retain the option to indicate in the first RTP that the activation was done outside the scheme.

M. Battistella pointed out that the scope of the activation is not the e-invoicing process itself but the sending of the RTPs with any document attached. As requested by the ERPB and committed by the previous work on EIPP the design of the servicing messages should not prevent other types of use in the future. The activation from the payee topic may actually be in the scope of the newly created RTP Multi-stakeholder Group and not of the EIPP MSG. For example, for the one-off e-invoice or for RTP, the activation process using specific messages could be an issue.

V. Kuntz and P. Spittler mentioned that however the consent is a legal requirement in e-invoicing.

After this discussion on the activation by the Payee the following agreement was reached:

* Continue with activation message by the Payer
* There are some issues with the expression of the consent in case of activation by the Payee and therefore this needs further investigation
* Alignement with RTP MSG is needed
* A special code for rejection should be foreseen in pain.014 to express the rejection of the EIPP service itself by the Payer
* The issue with misused RTPs should not be tackled in the standards but in the future EIPP rulebook
* The activation message by the Payee shouldn’t be proposed in the public consultation
* At the level of standards, the activation message should be designed with the idea to not prevent the activation by the Payee
* More inputs from the regulators on the consent issue are welcome

lunch break

Carry on with the topic about the activities per actor

V. Vlad displayed on screen and shared with remote participants the working document “EIPP MSG 011-19 activities-per-roles-notes”.

M. Battistella pointed out that, in addition to Directory Providers, the Routing Providers should be mentioned. Indeed, after verification in the EIPP 2018 report, this type of entities also has a role in the eco-system.

The following points were corrected or completed in the “activities” document:

* Messages to “entry points” => corrected in “EIPP Directories”
* Replace “sends” with “delivers” (of messages)
* Directory Providers can get/send messages from/to other Directory Providers
* Need for a “query” message used by the Payer EIPP Providers to look up for information in the Directory Providers repositories
* Add “forwarding (routing) agent” and its activity
* The Payee EIPP provider validation is a technical validation as the final validation is carried out by the Payee
* Other small clarifications and editorial changes

The document is saved in v0.2 and will be used by V. Kuntz and D. Forceville as input for further work using SWIFT designing tool.

Discussion on “amendment” message

Different cases of amendment were identified. For example, when any enrolment data other than the “EIPP Provider” is changed, there is a simple amendment, but when the EIPP provider changes, it represents a “replace” message. It is a special type of amendment as changing the EIPP provider has important effect on routing so that it is necessary to preserve the continuity of the service and up to date information.

It is very important for routing purposed that the new Payee provider to be known in the eco-system in case of change. V. Kuntz proposed the use of 2 status report messages: 1st when the Directory Provider is updated and a 2nd after receiving the confirmations that other Directory Providers or Payer EIPP Provider properly updated their repositories. However, it was stressed that it will be a heavy operational burden especially in case of a lot of different actors concerned (payer EIPP providers).

P. Spittler asked how a Payee can test that its enrolment was successful. A solution could be to make use of a “query” message. It has been agreed that this could be too complex so that the guarantee of successful enrolment may be included in the SLAs. Alternatively, the Directory Service Providers could provide access to Payees to verify their status (e.g. a webpage). In any case this topic shouldn’t be included in the standards but can be in the rulebook.

Discussion on “push” and “pull” mode

The Payer EIPP providers can obtain data from Directory Providers either in “push mode” (the Directory Providers send sets of data about enrolments and amendments), either in “pull mode” (the Payer EIPP Providers retrieve data from Directory Providers).

It has been agreed that the standard should support both modes. V. Kuntz proposed to mention it in the consultation and ask what the current solutions are, if they exist.

1. **Workshop on servicing messages : review the messages datasets**

V. Vlad displayed on screen the Excel file with the proposed datasets: “EIPP MSG 006-19 servicing\_messages\_datasets”. It was reviewed in parallel with the questions submitted by V. Kuntz prior to the meeting. Some data elements were clarified and modified in the file: “Creditor activity code”, “Creditor EIPP messaging address”, “Creditor customer identification type”.

The table was saved in version 0.2 after update. However, it has been agreed that the lists need further revision and this revision will remain on the agenda of the next meeting.

1. **Reuse of other ISO 20022 messages**

This agenda item was not discussed during the meeting.

1. **Business Justification**

V. Vlad reminded that he sent a first draft of the Business Justification document and feed-backs are still expected.

V. Kuntz responded that after a quick internal review the draft was sent to the ISO 20022 Registration Authority (within SWIFT) and their first feed-back was that it is too detailed so that some element fit better in the MDR document. The revisions need to continue for the next meeting.

V. Vlad pointed out that the section on expected volumes doesn’t contain figures yet. He invited the members to contribute. Several members proposed to get estimations from the Billentis yearly report on e-invoicing.

The meeting ended at 16:30.

**Annex I: Attendance List**

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| **Name** | **Institution** | **Attendance** |
| **Chairs** |
| Massimo Battistella | EACT (Telecom Italia) | Yes |
| Jacques Vanhautere | EPC (SEPAmail.eu) | Yes |
| **Members** |
| Sarah Elfstrand | EPC (Swedbank AB) | Yes |
| Carlota Sustacha | EPC (BBVA) | Apologies |
| Ivana Gargiulo | EPC (Consorzio CBI) | Yes |
| Slavenka Došen | EPC (Zagrebačka banka) | Apologies |
| Daniel Berger | EPC (SIX Banking Services) | Yes – via phone |
| Tarik Zerkti | ECommerceEurope | Apologies |
| Michel Gillis | EESPA | Yes – via phone |
| Charles Bryant | EESPA | Apologies |
| Pascal Spittler | EuroCommerce | Yes |
| **Observers** |
| Vincent Kuntz, Dominique Forceville | SWIFT | Yes |
| Bernard Darrius | Banque de France | Yes |
| Roxanne Romme | EC/DG FISMA | Apologies |
| **Secretariat** |
| Valentin Vlad | EPC | Yes |