

SEPA Direct Debit Core Rulebook

2020 Change Request Public Consultation

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Public Consultation 2020 Change Requests for SDD Core Rulebook

EPC003-20

Version 1.0

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The Single Euro Payments Area (SEPA) payment schemes, as set out in the SEPA Credit Transfer (SCT), the SEPA Instant Credit Transfer (SCT Inst), the SEPA Direct Debit Core (SDD Core) and the SEPA Direct Debit Business to Business (SDD B2B) rulebooks, evolve based on a transparent change management process adhered to by the European Payments Council (EPC). For details on the principles governing the EPC scheme change management process, we refer to sections 5, 6 and 7 in this document and the sources listed at the end of this page.

This SDD Core 2020 Change Request Public Consultation Document (document EPC003-20) details change requests for possible modifications to be introduced into the next version of the SDD Core rulebook. This public consultation document builds on change requests submitted by stakeholder representatives, banking communities and by EPC Working and Support Groups. The SDD Core 2020 Change Request Public Consultation Document offers the analyses and recommendations of the EPC Scheme Evolution and Maintenance Working Group (SEMWG) on the way forward regarding individual change requests. A summary overview of the change requests and related recommendations by the SEMWG is provided in section 1 of this Change Request Public Consultation Document.

The EPC submits the SDD Core 2020 Change Request Public Consultation Document for public consultation. The public consultation takes place between 12 March and 09 June 2020.

All scheme participants and stakeholders are encouraged to provide feedback on the possible changes to be introduced into the next version of the SDD Core rulebook by completing the response template EPC007-20 and send it to change-request.EPC-scheme@epc-cep.eu by 09 June 2020 at 17h00 CET at the latest. The EPC will not consider any feedback received after this deadline.

Proposed changes detailed in this SDD Core 2020 Change Request Public Consultation Document, which are broadly accepted by all scheme participants and stakeholders, and that are technically and legally feasible, will be taken forward, after approval by the Scheme Management Board (the EPC decision-making body in charge of the schemes' administration and evolution). Others will not be retained. The updated version of the SDD Core rulebook will be published in November 2020 for implementation in November 2021. In accordance with industry best practice, payment service providers and their suppliers have a one-year lead time to address rulebook updates prior to such updates taking effect.

More information about the maintenance and the evolution of the SDD Core scheme is available in Chapter 4 of the [Scheme Management Internal Rules \(The Internal Rules\)](#) being a binding Annex to the current applicable SDD Core rulebook.

It should be noted that the EPC is under the legal obligation to ensure compliance of the SDD Core rulebook with existing EU legislations or to any new EU legislation impacting the SDD Core rulebook.



Therefore, the EPC reserves the right to make necessary changes to the SDD Core rulebook at all times in order to ensure that the SDD Core rulebook does comply with changes to existing EU legislation or with the entry into force of any new EU legislation.

Please refer to Annex 1 for the original detailed change requests. This document contains only a summary of each individual change request.



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1. Executive Summary: Major Change Requests to the SDD Core Rulebook

1.1. EPC Approach

The principles governing the evolution of the Single Euro Payments Area (SEPA) payment schemes as set out in the SEPA Credit Transfer (SCT) and SEPA Direct Debit (SDD) rulebooks are detailed in the 'SEPA Scheme Management Internal Rules' (the Internal Rules). These Internal Rules are available for download on the European Payments Council ([EPC Website](#)). Sections 5, 6 and 7 in this SDD Core 2020 Change Request Public Consultation Document detail the application of the Internal Rules in the EPC scheme change management process.

The Internal Rules make a difference between so called major and minor changes to the EPC rulebooks. A major change is a change that affects or proposes to alter the substance of the rulebooks and the schemes. Any change to chapters 5 and 6 of the rulebooks is always considered a major change. A minor change is a change of an uncontroversial and usually technical nature that facilitates the comprehension and use of the rulebooks.

This executive summary of the SDD Core 2020 Change Request Public Consultation Document highlights change requests for major changes to the SDD Core rulebook received in this scheme change management cycle. Change requests for minor changes to the SDD Core rulebook are set out in section 4 of this Change Request Public Consultation Document. All change requests to the SDD Core rulebook are submitted for public consultation between 12 March and 09 June 2020. Information on how to share feedback with the EPC is included on the cover page of this Change Request Public Consultation Document.

The EPC received **16** change requests for major changes to be introduced into the SDD Core rulebook. The change requests submitted to the EPC are included in Annex 1 to this document.

A first change request is to migrate all ISO 20022 XML-based messages under the rulebook to the 2019 version of the ISO 20022 messaging standard in November 2022. Another change request suggests aligning all attribute numbers across all four EPC SEPA payment scheme rulebooks in November 2022.

Another proposal is the development of an SDD fixed amount option or scheme. One change request presents a few additional protection improvements for Debtors.

With respect to the current rulebook references to the e-Mandate operating model, one change request suggests removing all these references. Another change request instead proposes to update the e-Mandate operating model.

A few change requests point out the need to replace the calculation method of compensation currently based on EONIA into another calculation method. Various contributors suggest new r-transaction reason codes related to SDD Core collection blocking options that Debtors may set up.

Several change requests propose terminology changes in the rulebook: the replacement of the term 'Bank' with 'PSP' and an updated definition of the term 'Customer'. Another change request points out that there is a need to align the rulebook with the EU Funds Transfer Regulation.

All change requests to the SDD Core rulebook received were reviewed by the EPC Scheme Evolution and Maintenance Working Group (SEMWG). These change requests include the recommendation of the SEMWG regarding each of these change requests unless the SEMWG is not able to provide a recommendation for the public consultation. Each recommendation reflects one of the options detailed in items 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 would become part of the scheme and the rulebook would be amended accordingly.
- c) The change request should be included in the scheme as an **optional feature**:
 - The new feature is optional and the rulebook would be amended accordingly;
 - Each scheme participant¹ may decide to offer the feature to its customers, or not.
- d) The change request is **not considered fit for SEPA wide use** and could be handled as an additional optional service (AOS) by interested communities:
 - The proposed new feature would not be included in the rulebook or in the implementation guidelines released by the EPC with regard to the rulebook;
 - 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 enough communities, in a future version of the rulebook.
- e) The change request **cannot** be part of the existing scheme for one of the following reasons:
 - It is technically impossible;
 - It is not feasible (explained on a case by case basis);
 - It is out of scope of the EPC;
 - It does not comply with the SEPA Regulation² or any other relevant EU legislation.
- f) The change request may be considered for the development of a **new scheme**:
 - The change request reflects major changes which cannot be integrated into an existing scheme;
 - To develop the change request further, i.e. to develop a new scheme, the following requirements must 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 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.

1.2. Overview of Change Requests and Proposed Way Forward for Consideration by Respondents to the Public Consultation

The below table lists all the received change requests which are submitted for public consultation. The SEMWG has issued a recommendation on the way forward about each change request. The reasons underlying each recommendation are detailed in section 2. The final decision whether a change request will be incorporated into the rulebook is however subject to the outcome of the public consultation.

The contributors to this public consultation are requested to indicate whether they agree with the recommendation of the SEMWG on the way forward.

¹ A scheme participant is a payment service provider which has formally adhered to an EPC SEPA payment scheme.

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



In case the contributors do not agree with the SEMWG recommendation, they are requested to indicate in the comments section of the response template EPC007-20 their preferred way forward (e.g., support of the original change request, selecting another option).

Furthermore, any additional comments are welcome in the comments section.

Change Request item	Topic	Contributor	Recommendation of the SEMWG on the proposed way forward. The final decision is subject to the outcome of the public consultation.
1	Development of an SDD fixed amount option or scheme	SSTRATEGY	Cannot be part of the existing scheme - option e
3	Protection improvements for Debtors	James Kane	Cannot be part of the existing scheme - option e
6	Update calculation method of compensation currently based on EONIA	KPMG France	Should be incorporated into the scheme - option b
7	Replacement of references to EONIA into €STR	EPC SEMWG	Should be incorporated into the scheme - option b
8	Change request has been withdrawn	EPC SEMWG	Withdrawn
13	Removal of references to the e-Mandate operating model	EPC SEMWG	Should be incorporated into the scheme - option b
16	Alignment of all attribute numbers across all EPC SEPA payment scheme rulebooks	EPC SEMWG	Should be incorporated into the scheme as of November 2022 - option b
17	Changes to EPC208-08 'EPC e-Operating Model detailed specifications'	Multicert	Cannot be part of the existing scheme - option e
20	Migration to the 2019 version of the ISO 20022 messaging standard	EPC SEMWG	Should be incorporated into the scheme as of November 2022 - option b
24	New r-transaction reason codes	Dutch Payments Association	No SEMWG recommendation defined
35	Align the rulebook with the Funds Transfer Regulation	Banking & Payments Federation Ireland	Cannot be part of the existing scheme - option e
43	Replacement of the term Bank with PSP and updated Customer definition	EPC LSG	Should be incorporated into the scheme - option b



Change Request item	Topic	Contributor	Recommendation of the SEMWG on the proposed way forward. The final decision is subject to the outcome of the public consultation.
45	New r-transaction reason codes	GSMA	No SEMWG recommendation defined
46	Change request has been withdrawn	EPC legal adviser	Withdrawn
47	Change request has been withdrawn	EPC legal adviser	Withdrawn
48	New r-transaction reason codes	VGI	No SEMWG recommendation defined

1.3. Overview of Changes to Align the Next Version of the SDD Core Rulebook with any Existing EU Legislation and with the Entry into Force of New EU Legislation

The contributors to this public consultation are welcome to comment on these changes.

Ref.	Topic	Contributor	Way forward
01	Re-arrangement of the list of non-EEA SEPA authorisation references in the rulebooks	EPC LSG	See chapter 3 of this document.



2. Detailed Analysis of Major Change Requests to the SDD Core Rulebook

2.1. # 1: Development of an SDD fixed amount option or scheme

2.1.1. Description

This change request was made by SSTRATEGY.

The contributor proposed the introduction of a SEPA Direct Debit Fixed Amount (DDFA) which reduces the refund right to 1 week after the debit date. It could be developed as an option under the SDD Core rulebook, or as a new SDD scheme. In case the route of a new scheme would be chosen, the contributor recommends it to become mandatory.

For the DDFA limited refund right to be applicable, it should fulfil the following conditions:

- The exact amount and order of the debits must be stated in the mandate;
- The periodicity of the debits must be stated in the mandate. In order to decide if a debit complies with the periodicity stated in the mandate, the contributor suggests that the debit can be debited in the next 5 business days after the expected due date, taking into consideration the last debit date and the periodicity agreed.

All DDFA's which do not comply with these rules, would be entitled to the default SDD Core refund right of eight weeks. Every time a payer demands to return an DDFA beyond the refund period, the creditor bank should check if the debit breaks the DDFA conditions or not. If it complies with DDFA rules, the creditor bank will reject the refund.

DDFA mandates cannot be modified. A new mandate with a new Unique Mandate Reference will be required in case the parties want to change the amount, the order of the instalments or the periodicity stated in the mandate.

2.1.2. 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 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.

2.1.3. Rulebook impact

If this change request is supported, this will lead to a new EPC SEPA scheme consisting of a rulebook, C2B, interbank and e-Mandate implementation guidelines.



2.2. # 3: Protection improvements for Debtors

2.2.1. Description

This change request was made by Mr James Kane.

The contributor points out in a few personal experiences as a Debtor the need to improve the protection of the Debtor against fraudulent and unauthorised SDD Core collections.

The contributor suggests six concrete elaborated measures for the SDD Core rulebook to improve the protection of the Debtor with respect to

- The SDD Core mandate creation and use: one suggestion is that the Debtor submits a copy of the (amended) SDD Core mandate to the Debtor Bank;
- Introduction of a 'free trial' period of the service or good offered to the Debtor: during this period, the Creditor is not allowed to propose an SDD mandate to the Debtor for its sign-off;
- Service price evolution: any price increase to existing service contract requires the sign-off of a new mandate;
- Reimbursement of fraudulent SDD collections: all proven SDD collections should be reimbursed including those proven fraudulent collections dating back more than 13 months ago;
- Mandate structure and presentation: concrete lay-out instructions are proposed;
- The offering of SDD mandate management features in the online banking solutions of the Debtor Banks.

2.2.2. SEMWG analysis and recommendation

The SEMWG recommends not taking forward the change request (**option e**). The SEMWG points out that the following measures defined in the SDD Core rulebook and through EU legislation offer sufficient protection for Debtors:

- During the eight weeks following the direct debit date, the payer has the possibility of requesting a refund without having to provide any justifications. This is the right to a 'no-questions-asked' refund. SDD Core scheme participants can provide the Debtor with a range of channels to submit such request (e.g., online banking tool, customer service by phone or chatbox, physical branches).
- If the transaction was unauthorised (i.e. the collection does not relate to the signed mandate), the payer can ask for a refund up to 13 months after the direct debit as defined in the Payment Services Directive 2 (PSD2) from the EU and this refund will be done no later than by the end of the following business day.

Furthermore, the SEPA Regulation³ 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 to be blocked;
- Maximum number of Direct Debit transactions within a certain period is exceeded by the Creditor;

³ The [SEPA regulation \(EU\) No 260/2012](#) sets the rules and a deadline in February 2014 (later postponed to August 2014) for euro area countries to make credit transfers and direct debits in euro under the same conditions.



- SDD transaction exceeds a maximum amount.

2.2.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the C2B, interbank and e-Mandate implementation guidelines.



2.3. # 6: Update calculation method of compensation currently based on EONIA

2.3.1. Description

This change request was made by KPMG France.

It highlights that the discontinuation of EONIA is planned for 03 January 2022. The suggestion is to switch EONIA with the €STR rate.

2.3.2. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2021**. The SEMWG proposes the item # 7 in section 2.4 which covers the same topic in more detail.

2.3.3. Rulebook impact

If this change request is supported, this will only impact the rulebook.



2.4. # 7: Replacement of references to EONIA into €STR

2.4.1. Description

This change request was made by the SEMWG.

The [private sector working group on euro risk-free rates](#) for which the ECB provides the secretariat, formally recommended through a press release on [14 March 2019](#) that market participants gradually replace EONIA with the euro short-term rate (€STR) for all products and contracts, making the €STR their standard reference rate. The market transition from EONIA to the €STR would last until end 2021.

The SDD Core rulebook contains references to the EONIA rate. The change request outlines concrete changes in the SDD Core rulebook to reflect the transition to €STR.

2.4.2. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2021**. The item # 6 in section 2.3 covers the same topic.

2.4.3. Rulebook impact

If this change request is supported, this will only impact the rulebook.



2.5. # 8: Change request has been withdrawn

2.5.1. Description

This change request has been withdrawn.



2.6. # 13: Removal of references to the e-Mandate operating model

2.6.1. Description

This change request was made by the SEMWG.

With the publication of the e-Mandate e-Operating Model in March 2009, the EPC Plenary approved the establishment and the governance of “EPC Approved Certification Authorities” (CAs).

These CAs would take up a critical role in the e-Mandate e-Operating Model for the two SDD scheme rulebooks. Therefore, the EPC Plenary approved the establishment of the Certification Authority Supervisory Board (CASB). The CASB oversaw the oversight of the approval process for CAs who wished to become EPC approved in offering e-mandate services.

However, not one single candidate CA has applied to become recognised as ‘EPC approved CA’ for the Annex VII e-Mandate service. The EPC therefore disbanded the CASB at the start of 2019.

As the concept of the e-Mandate e-Operating Model itself did not materialize in practice leading to the formal disbandment of the CASB as a key body in this model, the suggestion is to remove all references to this model from both SDD rulebooks.

2.6.2. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2021**.

2.6.3. Rulebook impact

If this change request is supported, this will impact the rulebook and the e-Mandate implementation guidelines.



2.7. # 16: Alignment of all attribute numbers across all rulebooks

2.7.1. Description

This change request was made by the SEMWG.

Each SEPA payment scheme rulebook describes a range of attributes (ATs) which compose a dataset to be used to execute a certain rulebook process. Under each rulebook, each AT has a unique sequence number. However, many AT descriptions are identical or similar in all four rulebooks but they all bear a different unique sequence number in each rulebook.

The proposal is to align the sequence number of these ATs between the four rulebooks. This suggestion also includes the grouping of ATs and their subsequent sequence numbering into different AT sequence number categories. Each such category has its own sequence number structure.

Persons in charge of the implementation and maintenance of the SEPA usage rules in the customer-to-bank (C2B) and interbank systems, will get the same understanding about each AT sequence number in the SEPA usage rules of all C2B and interbank implementation guidelines (IGs). It also helps the EPC in its future management of the AT sequence numbering.

The SEMWG understands that such renumbering can impact individual scheme participants and payment end-users. They can use the current AT numbering in e.g., their technical implementation documentation and in technical and business processes.

As this change concerns a format change but not a change to any functional or business rules, the SEMWG proposes to isolate the implementation of this change from the other accepted changes for the 2021 EPC SEPA payment scheme rulebooks. The SEMWG proposes to implement this change in **November 2022**.

2.7.2. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2022** at the same time when the migration to the 2019 version of the ISO 20022 messaging standard (# 20) is proposed.

2.7.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the C2B, interbank and the e-Mandate implementation guidelines.



2.8. # 17: Changes to EPC208-08 'EPC e-Operating Model detailed specifications'

2.8.1. Description

This change request was made by Multicert.

The contributor points out that the processing of the optional e-Mandates under the SDD rulebooks is specified in the EPC208-08 “e-Operating Model detailed specifications” dated April 2013. From the date it was released, the contributor reports two significant events:

- The rollout of eIDAS, which introduced a common trust framework at EU level. The regulation is accompanied by several ETSI technical standards, which helped to develop an ecosystem of eIDAS trust service providers, cross-border connecting building blocks and solution developers;
- The approval of PSD2 introducing payment initiation and account information services.

Given these events, the contributor proposes the following change requests:

1. Extend the messages defined in EPC208-08 to, at the sole discretion of the Debtor Bank, allow the electronic signature of the e-Mandate by the Debtor (through an individual qualified certificate, e.g., eID, cloud-based certificate), in addition to the electronic signature (or seal, as introduced by eIDAS) by the Debtor Bank.
2. Replace the proprietary certificate profiles defined in EPC208-08 by the PSD2 certificate profiles defined in ETSI TS 119 495 “Qualified Certificate Profiles and TSP Policy Requirements under the payment services Directive (EU) 2015/2366”, according to the certificate usages and PSD2 authorized roles.

2.8.2. SEMWG analysis and recommendation

The SEMWG recommends not taking forward the change request (**option e**) for the SDD Core scheme. The SEMWG submits the item # 13 in the section 2.6 of this document proposing the removal of all references to this model from both SDD rulebooks.

2.8.3. Rulebook impact

If this change request is supported, this will impact the rulebook and the e-Mandate implementation guidelines.



2.9. # 20: Migration to the 2019 version of the ISO 20022 messaging standard

2.9.1. Description

This change request was made by the SEMWG.

For the launch of the various EPC SEPA payment schemes in January 2008, November 2009 and November 2017, the EPC selected the 2009 version of the ISO 20022 XML-based messaging standard. The EPC notes new payment market developments for which the 2009 version of the ISO standard is not suitable to support.

Furthermore, throughout the years, the EPC SEPA payment schemes cover already a variety of ISO 20022 versions for messages between these payment schemes. If the future rulebooks would include new business procedures or existing procedures could be amended or extended, messages based on a more recent ISO 20022 version may have to be used adding further variety.

The EPC proposes to migrate the four schemes to the 2019 version of the ISO 20022 standard as it is suitable to support new payment features and to align all current rulebook messages on one and the same ISO 20022 version.

The EPC notes the decision by several market infrastructures to migrate to the ISO 20022 standard i.e. Target2 from Eurosystem and EURO1 from EBA Clearing by November 2021 and the global migration of SWIFT from its FIN messages to the ISO 20022 standard starting from November 2021 until November 2025. These infrastructures have decided to use the 2019 version of the ISO 20022 standard.

However, the EPC proposes to migrate the four schemes as of **November 2022** to the 2019 version. This migration date allows the EPC SEPA payment scheme participants to spread the workload. Otherwise, they would have to change three (possibly four) different payment systems or platforms by November 2021.

Subject to a positive public consultation outcome on this change request, the EPC will formally communicate this ISO version migration in November 2020 when publishing the 2021 EPC SEPA payment scheme rulebooks and the related Implementation Guidelines (IGs).

The IGs published in November 2020 will still be predominantly⁴ based on the 2009 version of ISO 20022 and will be applicable from November 2021 to November 2022. A second set of 2021 IGs will be published latest in the second quarter of 2021. This second cluster of the mandatory C2B and interbank IGs will then be based on the 2019 version of the ISO 20022 standard.

The ISO version migration will be a big-bang migration, i.e. no transitional period will be foreseen. This means that all EPC SEPA payment scheme participants offering ISO 20022 message-based payment services to their customers, must then support the 2019 version as of November 2022.

On the other hand, the (corporate) customers may still use another ISO version to exchange SEPA transactions in an XML format with their PSPs if so bilaterally agreed.

The annex of the change request covers a high-level gap analysis between the 2009 and the 2019 pain., pacs. and camt. messages used in the four EPC SEPA payment scheme rulebooks.

⁴ Some messages described in the IGs are based on a more recent version of ISO 20022.



2.9.2. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2022** at the same time when the alignment of all attribute numbers across all rulebooks (# 16) is proposed.

2.9.3. Rulebook impact

If this change request is supported, this will impact the C2B, the interbank and the e-Mandate implementation guidelines.



2.10. # 24: New r-transaction reason codes

2.10.1. 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 Direct Debit transactions which are returned based on these blocking options as set by the Debtor(s). This requires more specific reason codes (next to SL01; “Due to specific service offered by the Debtor Agent”).

Introducing specific codes for these four (optional) settings will help all parties involved to inform each other in a more accurate way. It also helps Creditors to act/communicate in line with (one of) the four possible blocking options as used by the Debtor(s).

Code	Name	Definition
SL11	Creditor not on Whitelist of Debtor	Whitelisting service offered by the Debtor Agent; Debtor has not included the Creditor on its “Whitelist” (yet). In the Whitelist the Debtor may list all allowed Creditors to debit Debtor bank account.”
SL12	Creditor on Blacklist of Debtor	Blacklisting service offered by the Debtor Agent; Debtor included the Creditor on his “Blacklist”. In the Blacklist the Debtor may list all Creditors not allowed to debit Debtor bank account
SL13	Maximum number of Direct Debit Transactions exceeded	Due to Maximum allowed Direct Debit Transactions per period service offered by the Debtor Agent
SL14	Maximum Direct Debit Transaction Amount exceeded	Due to Maximum allowed Direct Debit Transaction amount service offered by the Debtor Agent

2.10.2. SEMWG analysis and recommendation

The SEMWG has **no recommendation** about this change request for the public consultation.

The SEMWG looks forward to the feedback from the SDD scheme participants **and** SDD payment end-users on this change request during the public consultation. The SEMWG notes that the generic code SL01 is frequently used in some SEPA countries.



2.10.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the C2B and interbank implementation guidelines.



2.11. # 35: Align the rulebook with the Funds Transfer Regulation

2.11.1. Description

This change request was made by Banking & Payments Federation Ireland (BPFI).

The contributor suggests aligning the rulebook with the derogations foreseen in the Regulation 2015/847/EU (Funds Transfer Regulation).

This Regulation allows PSPs some derogations when they process SCT and SDD transactions and more specifically the derogations under Article 6 (2), linked to transactions up to € 1000, and article 8 (1), linked to the use of effective risk-based procedures.

The background for this change request is the recent discussions that the Irish banking and payments industry has undertaken with its National Regulator during the Brexit preparations.

2.11.2. SEMWG analysis and recommendation

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

The current rules do not cause any new issues for scheme participants (which already include participants from non-EEA countries) and their customers as they are clear to understand. Otherwise, scheme participants would have to explain to their customers in which cases they have to or may not provide the address of the payer.

2.11.3. Rulebook impact

If this change request is supported, this will impact the rulebook and the interbank implementation guidelines.



2.12. # 43: Replacement of the term Bank with PSP and updated Customer definition

2.12.1. Description

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

The suggestion is to replace the term “Bank” with the term “PSP” in all EPC SEPA payment scheme rulebooks to formally reflect the changes introduced by PSD2 to the categories of institutions that can offer payment services, and the variety in PSP categories that are eligible to adhere to the EPC SEPA payment schemes.

This proposal will lead to term changes in the rulebooks, the related Implementation Guidelines and the various rulebook annexes (scheme options, risk management, internal rules). It also covers the inclusion of the definition “PSP” and the amendment of the term “Customer”.

2.12.2. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2021**.

2.12.3. Rulebook impact

If this change request is supported, this will impact the rulebook, all rulebook annexes and the customer-to-bank and interbank implementation guidelines.



2.13. # 45: New r-transaction reason codes

2.13.1. Description

This change request was made by the Global Association of Mobile Operators (GSMA).

The contributor requests more specific r-transaction reason codes in addition to the reason code SL01 “Specific Service Offered By Debtor Agent”. Currently, the Creditor only receives the code SL01 but cannot determine the **precise** issue. Meanwhile, the collection processes of the Creditor will continue based on a valid SDD mandate.

If the Creditor receives a more precise reason code, it can swiftly communicate to the Debtor the reason that is causing the collection failure at the Debtor’s end. This will prevent the Debtor from being sent “pillar to post” in order to resolve the issue as quickly as possible. The below proposed codes, to be used by Debtor Banks, identify the following four reasons:

Code	Name	Definition
SL11	Creditor not on Whitelist of Debtor	Whitelisting service offered by the Debtor Agent; Debtor has not included the Creditor on its “Whitelist” (yet). In the Whitelist the Debtor may list all allowed Creditors to debit Debtor bank account. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.
SL12	Creditor on Blacklist of Debtor	Blacklisting service offered by the Debtor Agent; Debtor included the Creditor on his “Blacklist”. In the Blacklist the Debtor may list all Creditors not allowed to debit Debtor bank account. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.
SL13	Maximum number of Direct Debit Transactions exceeded	Due to Maximum allowed Direct Debit Transactions per period service offered by the Debtor Agent. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.
SL14	Maximum Direct Debit Transaction Amount exceeded	Due to Maximum allowed Direct Debit Transaction amount service offered by the Debtor Agent. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.

The contributor also reports in the change request itself several day-to-day situations which Creditors are faced with and how the proposed more precise reason codes can assist the Creditor in resolving the SDD collection failure with the Debtor.



2.13.2. SEMWG analysis and recommendation

The SEMWG has **no recommendation** about this change request for the public consultation.

The SEMWG looks forward to the feedback from the SDD scheme participants **and** SDD payment end-users on this change request during the public consultation. The SEMWG notes that the generic code SL01 is frequently used in some SEPA countries.

2.13.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the C2B and interbank implementation guidelines.



2.14. # 46: Change request has been withdrawn

2.14.1. Description

This change request has been withdrawn.



2.15. # 47: Change request has been withdrawn

2.15.1. Description

This change request has been withdrawn.



2.16. # 48: New r-transaction reason codes

2.16.1. Description

This change request was made by the Verenigde Groot Incassanten (VGI) (association of large SDD users in the Netherlands).

The contributor requests more specific r-transaction reason codes in addition to the reason code SL01 “Specific Service Offered By Debtor Agent”. Currently, the Creditor only receives the code SL01 but cannot determine the **precise** issue. Meanwhile, the collection processes of the Creditor will continue based on a valid SDD mandate.

If the Creditor receives a more precise reason code, it can swiftly communicate to the Debtor the reason that is causing the collection failure at the Debtor’s end. This will prevent the Debtor from being sent “pillar to post” in order to resolve the issue as quickly as possible. The below proposed codes, to be used by Debtor Banks, identify the following four reasons:

Code	Name	Definition
SL11	Creditor not on Whitelist of Debtor	Whitelisting service offered by the Debtor Agent; Debtor has not included the Creditor on its “Whitelist” (yet). In the Whitelist the Debtor may list all allowed Creditors to debit Debtor bank account. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.
SL12	Creditor on Blacklist of Debtor	Blacklisting service offered by the Debtor Agent; Debtor included the Creditor on his “Blacklist”. In the Blacklist the Debtor may list all Creditors not allowed to debit Debtor bank account. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.
SL13	Maximum number of Direct Debit Transactions exceeded	Due to Maximum allowed Direct Debit Transactions per period service offered by the Debtor Agent. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.
SL14	Maximum Direct Debit Transaction Amount exceeded	Due to Maximum allowed Direct Debit Transaction amount service offered by the Debtor Agent. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.

The contributor also reports in the change request itself several day-to-day situations which Creditors are faced with and how the proposed more precise reason codes can assist the Creditor in resolving the SDD collection failure with the Debtor.



2.16.2. SEMWG analysis and recommendation

The SEMWG has **no recommendation** about this change request for the public consultation.

The SEMWG looks forward to the feedback from the SDD scheme participants **and** SDD payment end-users on this change request during the public consultation. The SEMWG notes that the generic code SL01 is frequently used in some SEPA countries.

2.16.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the C2B and interbank implementation guidelines.



3. Changes Pertaining to the Impact of the SEPA Regulation or any Other EU Legislation

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

This change is qualified as “Change for Regulatory Reasons” within the meaning of Section 4.2.9 of the SMIRs, due to legal amendments that “necessitate the urgent alignment of the Schemes with such rules and regulations”:

Change	Reason for change
<p>This change request leads to the following changes:</p> <p>Reorganisation of Section 5.4 – Eligibility for Participation (All Rulebooks)</p>	<p>The present change aims at updating the EPC SEPA Payment Schemes Rulebooks (along with the Schemes Adherence Guide and the SEPA Schemes Adherence Packages, namely the standard template for the Legal Opinion) with regards to the relevant authorisation and regulatory requirements for PSPs of non-EEA SEPA Countries, to which the geographical scope of the SEPA payment schemes has been extended.</p> <p>This update is triggered by the recent inclusion in the SEPA schemes’ geographical scope of:</p> <ul style="list-style-type: none"> i) Andorra (2018), and ii) the Vatican City State/Holy See (2019). <p>For which the following references will be added under Section 5.4:</p> <p><i>8) An undertaking duly incorporated in the Andorran Financial System on December 21st, 1949, according to Andorran laws regulating the financial system, and specifically according to Law 7/2013, of 9 May 2013, on the legal regime of the operative entities of the Andorran financial system and other provisions regulating the exercise of financial activities in the Principality of Andorra, as amended from time to time”</i></p> <p><i>9) An entity incorporated in the Vatican City State and Authorised by the Financial Information Authority in accordance with Regulation 1/2014”</i></p> <p>The exercise shall be repeated in due course also for UK’s PSPs, which will remain entirely subject to PSD2 only until the 31 December 2020 (i.e. for the whole duration of the transition period).</p> <p>Following the expiration of said period, UK will need to provide a suitable reference to the relevant UK legal acts covering the authorisation requirements of its PSPs, in accordance with the principle of the regulatory level playing field amongst SEPA scheme participants.</p>



Change	Reason for change
	<p>However, it is hereby noted that the current list included under Section 5.4 of the Rulebooks, namely:</p> <p><i>“3) A bank which is authorised in accordance with Article 3 of the Federal Law on Banks and Savings Banks of 8 November 1934 by the Swiss Financial Market Supervisory Authority (FINMA);</i></p> <p><i>4) A bank which is authorised by the Central Bank of San Marino in accordance with Article 7, Part I, Title II, of the Sammarinese Law No. 165 (approved on November 17th, 2005) and with Regulation No. 07 of 2007;</i></p> <p><i>5) An undertaking incorporated in Jersey and registered with the Jersey Financial Services Commission to conduct deposit-taking business under the Banking Business (Jersey) Law 1991;</i></p> <p><i>6) An undertaking incorporated in Guernsey and registered with the Guernsey Financial Services Commission to conduct deposit-taking business under the Banking Supervision (Bailiwick of Guernsey) Law 1994; or</i></p> <p><i>7) An undertaking incorporated in the Isle of Man and licensed by the Isle of Man Financial Services Authority to conduct deposit-taking business under the Isle of Man Financial Services Act 2008.”</i></p> <p><i>[+ 8) Andorra and 9) Vatican City State]</i></p> <p>is likely to be subject to more frequent regulatory changes than the rest of the Rulebooks’ sections, being it triggered either by any change in the current authorisation framework for said institutions (as result, for example, of the continuous legal compliance exercise performed by the EPC) or by the inclusion in the SEPA schemes geographical scope of new non-EEA SEPA countries, such as the UK in the future.</p> <p>To this extent, in order to avoid frequent publications of the Rulebooks, which may ultimately generate confusion amongst Participants, and in order to maintain said section regularly updated, also in line with the Overseer requirements, it is hereby proposed a change of structure of Section 5.4, under the Rulebooks, as follows:</p> <p>“Applicants which fall within one of the following categories shall be deemed automatically to be eligible under this section:</p> <p>1) A credit institution which is authorised in accordance with Article 8 (1) of Directive 2013/36/EU by a state which is a member of the European Economic Area;</p> <p>2) The institutions referred to in points (2) to (23) of Article 2 (5) of Directive (EU) 2013/36/EU;</p> <p>3) Institutions/entities/undertakings incorporated in a non-EEA country to which the SEPA schemes geographical scope has been extended, and authorised or licensed by the relevant Authority, in accordance with the provisions enclosed under the document EPC 409-09.</p>



Change	Reason for change
	<p>By extracting from the Rulebooks the abovementioned current points 3) to 9), and including a new point 3), with the reference to the document EPC409-09 (“EPC list of countries and territories included in the SEPA Schemes’ geographical scope”) the EPC would achieve two results:</p> <ul style="list-style-type: none"> i) maintain a complete reference in the Rulebooks to the relevant authorisation requirements, covering both EEA and non-EEA SEPA countries, and ii) optimise the current changes related to the regulatory level playing field of non-EEA SEPA scheme participants, without the need to amend – and publish, intermediary versions of the Rulebooks or wait for each Change Management Cycle to be able to reflect such changes. <p>It is recommended to qualify the present change as “<i>Change for Regulatory Reasons</i>” within the meaning of Section 4.2.9 of the SMIRs, due to legal amendments that “<i>necessitate the urgent alignment of the Schemes with such rules and regulations</i>”.</p>



4. Detailed Analysis of Minor Changes to the SDD Core Rulebook

The SEMWG recommends supporting the following minor change requests:

4.1. Change Requests

Section	Description	Reason for change	Type of Change
Entire rulebook	<p>Alignment of the annex numbering for each EPC SEPA payment scheme rulebook:</p> <ul style="list-style-type: none"> Annex I – Adherence agreement Annex II – SMIR (previously Annex IV) Annex III – Risk Management (previously Annex II) Annex IV – RB amendments & changes (previously Annex III) <p>This will also lead to changes in the Annex numbering references throughout each rulebook.</p>	To apply the same numbering of the generic rulebook annexes across all rulebooks.	CHAN
1.5	<p>Removal of the bullet point:</p> <ul style="list-style-type: none"> Participants which have adhered to the Scheme may participate only through an EEA licensed branch unless they participate through their SEPA head office (which may be located in a SEPA country or territory outside the EEA) 	This bullet point is redundant. The section 3.2.3.1 of the SMIRs and the section 3.5 of the document EPC012-17 Guide to the SEPA Schemes Adherence Process provide the complete adherence information.	CHAN
1.5	<p>Removal of the bullet point:</p> <ul style="list-style-type: none"> The rules ensure that responsibility for risk management is allocated to where the risk lies and that liability falls where the fault lies 	This bullet point is redundant. Chapter 5 of each rulebook clearly specifies aspects with respect to risk management and refers to the Risk Management Annex which is an integral part of the rulebook.	CHAN
5.13	<p>(...)</p> <p>Unresolved Issues and Compliance</p> <p>Sections 2.33.3 and 2.43.4 of the Internal Rules will not apply in the event of an Unresolved Issue relating to Interchange Fee arrangements.</p>		TYPO



5. Principles Governing the Change Management Cycle

5.1. Change Request Public Consultation Document

This Change Request Public Consultation Document is submitted by the SEMWG in accordance with the procedures set out in the Internal Rules in respect of changes to the SDD Core rulebook.

5.2. Structure of the Change Request Public Consultation Document

Sections 2, 3 and 4 describe the changes to the SDD Core rulebook which are proposed in this Change Request Public Consultation Document.

These change requests fall into three categories:

- Section 2 covers innovative change requests to technical operations in chapters 3 and 4 of the rulebook and other significant non-technical changes which fall within the definition of major changes;
- Section 3 covers change requests to align the SDD Core rulebook with the SEPA Regulation and any other EU legislation;
- Section 4 proposes changes to correct typing errors and provide additional clarification to the SDD Core rulebook. These changes consist of minor changes to the SDD Core rulebook which are uncontroversial in nature and do not affect technical operations.

Annex 1 contains all received original change requests for the 2020 SDD Core rulebook change management cycle.



6. Change Management Cycle in respect of Major Change Requests

6.1. Consideration of Change Requests

In accordance with chapter 4.1.4 of the Internal Rules, a number of change requests with respect to the rulebooks have been submitted for consideration to the SEMWG. 16 of these are applicable to the SDD Core scheme.

Following consideration of these change requests as required under chapter 4.1.6 of the Internal Rules, the SEMWG has determined: (a) that the change requests set out in section 2 and 3 meet the criteria for acceptance into the 2020 SDD Core rulebook change management cycle; and (b) that the change requests set out in section 4 constitute minor change requests invoking the procedures set out in Chapter 4.3 of the Internal Rules.

6.2. Change Request Public Consultation Document

The SEMWG is responsible for the preparation and development of a Change Request Public Consultation Document in respect of the major change requests referred to in section 2 above, and guiding the change requests through the rulebook change management cycle.

The SEMWG has therefore formulated this Change Request Public Consultation Document under chapter 4.2 of the Internal Rules. This Change Request Public Consultation Document analyses the major changes which have been proposed and contains in Annex 1 the original change requests.

6.3. SEMWG Recommendations

The SEMWG is required under chapter 4.2.1 of the Internal Rules to issue a recommendation on the way forward with regard to each change request. The reasons underlying each recommendation are detailed in section 2. The final decision whether a change request will be incorporated into the SDD Core rulebook is however subject to the outcome of the public consultation.

The contributors to this public consultation are requested to indicate whether they agree with the recommendation of the SEMWG on the way forward. In case the contributors do not agree with the SEMWG recommendation, they are requested to indicate their preferred way forward.

6.4. Public Consultation on the Change Requests

The EPC encourages all SEPA stakeholders to provide feedback during the public consultation. PSP communities are asked to consult all their members who are involved in the SDD Core scheme to ensure that the views of the payment services constituency are considered in the public consultation process. The SEMWG encourages the PSP communities to consult as wide a range of stakeholders as possible, including participants, end users and service suppliers. All stakeholders should provide feedback to the EPC on the Change Request Public Consultation Document by **09 June 2020 at 17h00 CET at the latest. The EPC will not consider any feedback received after this deadline.**

6.5. Next Steps

Considering the comments received during the public consultation, the SEMWG will produce a Change Proposal Submission Document to the EPC Scheme Management Board (SMB) for decision-making purposes in accordance with section 4.2.5 of the Internal Rules, and to the EPC Stakeholder Forums (see section 4.4 of the Internal Rules), i.e. the Scheme End-User Forum (SEUF) and the EPC Scheme Technical Forum (ESTF), for their respective positions on the SEMWG Change Proposals.

Approved change requests will be incorporated into the version 1.0 of the 2021 SDD Core rulebook and published in November 2020 with the intention that they become effective in November 2021.



6.6. Further Information

The above is a summary of the change management process. If you would like further information, please refer to the Internal Rules or contact the EPC Secretariat.



7. Change Management Cycle in respect of Minor Change Requests

7.1. Publication of List of Minor Change Requests

The SEMWG has identified certain minor change requests which they consider necessary for the SDD Core rulebook.

The SEMWG is required under the Internal Rules to publish a list of minor change requests on the EPC website and to ensure that the list may be viewed by all stakeholders. This obligation shall be met by the publication of this Change Request Public Consultation Document, and in particular through the provision of section 4 noting certain change requests as 'minor'.

7.2. Comments on the Minor Change Requests

All stakeholders may submit comments on the list of minor change requests in this Change Request Public Consultation Document.

7.3. Submission of the List of Minor Change Requests to the SMB

The list of minor change requests shall be submitted to the SMB via the Change Proposal Submission Document in accordance with section 4.2.5 of the Internal Rules.



Annex 1 - Original Change Requests

[X] Public – [] Internal Use – [] Confidential – [] Strictest Confidence

Distribution: Publicly available

for proposing a change request in a SEPA Payment Scheme

Responses by e-mail to: change-request.EPC-scheme@epc-cep.eu

by 31 December 2019

Name of contributor:	Gabriel Carpintero
Organisation:	SSTRATEGY
Address:	Andres Tamayo 3 28028 – Madrid
Contact details:	gabriel.carpintero@sstrategy.io (+34) 917 13 13 13 / (+34) 678 672 463
Your reference:	SEPA Fixed Amount Direct Debit (DDFA)
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2019 SEPA Credit Transfer Rulebook Version 1.0 EPC004-16 2019 SEPA Instant Credit Transfer Rulebook Version 1.0 EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	27/07/2018
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules



1 General Description of the Change Request

1.1 Suggested launch date (if any):

As soon as possible.

1.2 Description of the change request:

According to PSD2 article 76, SEPA CORE Direct Debits authorised through Mandates which specify the exact amount to be charged to the payer, **could be not entitled** to the 8 weeks refund right defined in PSD2 article 77.

We ask for a SEPA Fixed Amount Direct Debit (DDFA) which reduces the refund right to 1 week after de debit date. It could be a new option under the CORE Rulebook, or even a new SDD Scheme in itself. In case of being formulated a new Scheme, must be mandatory. For DDFA limited refund right to apply, it will have to fulfil the following conditions:

- The exact amount and order of the debits must be stated in the mandate, either if it is a fixed amount for all the debits, or several different amounts. E.g.: 1st instalment: 100 €. 2nd to 9th instalments: 200 €. 10th and final instalment: 300 €.
- The periodicity of the debits must be stated in the mandate. The periodicity must not be exact, given that debit dates are affected by clearing days. In order to decide if a debit complies with the periodicity stated in the mandate, we suggest that the debit can be debited in the next 5 business days after the expected due date, taking into consideration the last debit date and the periodicity agreed. E.g. A monthly debit, was charged last time the 10th of January 2019. It should be debited next time on Sunday 10th of February 2019. As it is not a clearing day, it must be debited in the next 5 business days.

All DDFA which do not comply with these rules, are entitled to the CORE refund right. Everytime a payer, demands to return a DDFA beyond the refund period, the creditor bank will have to check if the debit breaks DDFA rules or not. If it complies with DDFA rules, the creditor bank will reject the refund.

FFDA Mandates could no be modified. It will be required a new mandate with a new Unique Mandate Reference, in case the participants want to change the amount, order of the instalments or periodicity stated in the mandate.

1.3 Wherever possible, please indicate:

1. Impact on the Scheme in general:

A new SDD CORE option or mandatory Scheme will be required.

A new Mandate form will be required to include the amount, instalments and periodicity.

2. Impact on the interbank space:

Limited.

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

A new Local Instrument Code: DDFA, will be required.

Maybe new Mandate Related Information fields to inform the amount, order and periodicity of the debits authorised by the mandate.

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

Limited.

5. The nature of the change request:

A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

2 Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	Yes. On the one hand, Fix Amount Direct Debits are widely used across SEPA. On the other hand, most companies using Direct Debits want to reduce the risk derived from the 8 weeks “no-questions-asked” refund right. Many creditors will adopt DDFA if it is finally accepted.
Is the change request underpinned by a cost-benefit analysis?	No. Although it have clear advantages such as protecting the customer and reducing financial risks to creditors.
Does the change fit into the strategic objectives for SEPA?	Yes. It provides a new SEPA payment which will be widely used, protects the customer and reduces financial risk to companies.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	Yes.
Do you consider that the change request does not impede SEPA-wide interoperability?	The only interoperability issue we have identified is that national payments laws might not allow for a SEPA DDFA as we have defined it. In that case, it could be modified in order to comply with the most demanding national laws regarding refund rights, so it can be kept a single option for all SEPA.
Do you consider that the change request is in the scope of the scheme involved?	Yes.

TO : Mr. Bart Clarebout
Mgr. SDD Schemes
European Payments Council
Brussels
March 14, 2019

FROM : James Kane
844 Chemin du Plan
06360 Mouans Sartoux
France

Dear Mr. Clarebout,

My primary objective in writing is to propose 6 new / modified rules for inclusion in the SDD Core scheme rulebook. - urgently needed to reduce the exposure of Core scheme debtors to fraudulent activities.

I am aware of the scheme's security deficiencies from personal experience - 4527,00 Euro (min) unauthorized extractions from my bank account. This incident is fully documented via the letters exchanged with my debtor bank and the creditors. The analysis embedded in these letters is the basis for the rule changes I propose.

After investigation, my bank eventually confirmed that a creditor problem was the cause of my loss, and I have received compensation within the EPC's current 13 month rule constraint. I have appreciated my banks consideration and promptness in this matter.

However, I continue discussion with my bank to request that they propose my case to the EPC (you) for classification as a 'major incident'. I believe that such incidents, involving fraudulent extractions from a debtors account should be exempt from the 13th month rule. Your inevitable involvement in that decision is a secondary reason for this letter.

To reach this milestone with my bank has involved a long and arduous effort - which I would not have undertaken if **a)** I was not retired with time to spare and **b)** if I did not have the technical confidence gained from 30 years experience in IT - including business application development and implementation. I understand IT architecture and process.

I believe many victims of such smaller scams are content to have the fraudulent payments stopped and - and leave it at that. Most people do not have the time to pursue compensation or don't know how to go about it - and others simply don't detect the fact they are being scammed at all ! (See attachment SCAM VICTIMS... voices on line)

This reality is recognized by fraudster creditors in the design of their 'customer support' facilities - designed to completely demotivate their victims from seeking compensation or even stopping the continuance of unapproved extractions !

Core Debtor protection priority within EPC does not appear much more than a sentimental nod (from EPC doc...) : **"In addition, security is key: consumers enjoy a fast and simple refund procedure".** I can assure you that the procedure is not simple or fast or Enjoyable. A more robust EPC support protection is a third reason for writing to you.

Best Regards



PREAMBLE - SEPA DD CORE SCHEME - INADEQUATE DEBTOR PROTECTION

EPC schema support for CDD Core Debtors is summed up in this document extract: -

"In addition, security is key: consumers enjoy a fast and simple refund procedure".

There are a number of problems with the above. Firstly the embedded assumption that the current process is robust from a debtor protection perspective - examples below suggest this is not the case. Secondly it guarantees that, if an occasional problem does arise, the debtor will enjoy FAST, SIMPLE refunds - in reality it is not fast nor simple. It demands time to make calls, interact with bank, and write letters to creditors - it's time which the average user does not have ! Is the SDD core schema fit for purpose ?

Here are examples of the SDD Core process failure in providing debtor security. They are based primarily on personal experience of fraudulent extractions from my bank account and my efforts to stop those extractions and obtain reimbursement :-.

- Service contracts, signed at the point of sale, can be magically 'tweaked' into Service Mandates which will include services not discussed nor agreed to at point of sale. These falsified mandates manage to pass the SDD Core process controls and to eventually trigger fraudulent extractions from the debtor's bank.
- Further to above .. QUE CHOISIR - well known French consumer protection organization (<https://www.quechoisir.org//>). Describes how one creditor sales environment was corrupted to leverage SDD Core process weaknesses.
- Services (for example, mobile insurance) can be sold at point of mobile sale - on the basis of 1 month free trial and the undertaking that a cancellation telephone call before the end of trial will trigger 'no buy' and no debtor bank extractions. Even though the cancellation telephone call is made (after many 'redirects' and 'callbacks' to reach the 'responsible' person), the trial mandate is not cancelled by the creditor, with extractions starting and continuing to be made from debtor bank account.
- Original service mandat pricing can be arbitrarily increased over time and extracted from debtor's bank - **without any debtor notification or approval**. These increases can approach 100% of the original contract price - illustrating a complete breakdown of the SDD Core process with regard to debtor protection.
- Currently, mandates submitted in current month from the creditor bank to trigger an extraction for the debtor's bank account are not accessible from the debtors online bank account. Consequently it is impossible for the debtor to review extraction demands to verify that the original approved mandate has not been altered.

A review and upgrade of the existing EPC rulebook for the SDD Core Scheme is required to fix the above weaknesses. The attached EPC rulebook changes to combat fraud give my suggestions for that upgrade - based on experience as a defrauded debtor.

EPC RULEBOOK CHANGES TO COMBAT FRAUD

1. MANDATE CREATION AND USE

- a. In addition to current rules, the Debtor will ALSO provide a signed copy of the new/revised mandate to his debtor bank.
- b. Approval of a monthly extraction from debtor's bank requires debtor bank process to confirm that the creditor and debtor bank mandates are identical.

2. 'FREE TRIAL' MANDATE CREATION

- a. Mandate creation is not permitted prior to completion of a 'free trial'.
- b. Potential creditor **may only** send a proposed mandate to a potential debtor after the debtor trial period has expired.
- c. Debtor failure to sign and return proposed mandate **must be interpreted by creditor as a refusal** of creditor proposed service.

3. SERVICE PRICE EVOLUTION

- a. Any price increase to existing contract requires the creation of new mandate in line with 1) above.

4. REIMBURSEMENT FOR FRAUDULENT SEPA DD PAYMENTS

- a. All proven fraudulent SEPA payments will be refunded to debtor - current SEPA DD 13 month time limit will not apply in proven fraudulent circumstances.

This will prevent rewarding fraudulent creditor activity by allowing offenders to escape core debtor reimbursement after the 13 month discovery date.

5. MANDATE STRUCTURE AND CONTENT

- a. Mandates **will** be written on a single page and only address measureable service deliverables and payments schedule.
- b. No advertising content will be added to the mandate page
- c. No text smaller than size 11 will be used.

The above will prevent the deliberate creation of 'clutter' to inhibit easy comprehension by the debtor customer

6. DEBTOR ONLINE BANK ACCOUNT - MANDATE MANAGEMENT.

- a. Active creditor mandates will be available (via debtor online bank account) for review by debtors.
- b. Existing facility for debtors to block a current creditor demand will be maintained.

[X] Public – [] Internal Use – [] Confidential – [] Strictest Confidence

Distribution: Publicly available

for proposing a change request in a SEPA Payment Scheme
Error! Unknown document property name.

by 31 December 2019

Name of contributor:	Moaad Benjadi
Organisation:	KPMG France
Address:	
Contact details:	mbenjadi@kpmg.fr
Your reference:	
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2019 SEPA Credit Transfer Rulebook Version 1.0 EPC004-16 2019 SEPA Instant Credit Transfer Rulebook Version 1.0 EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	June 3rd 2019
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules



1 General Description of the Change Request

1.1 Suggested launch date (if any):

October 2019

1.2 Description of the change request:

In the framework of IBOR transition, I think the use of EONIA as reference rate for the "Compensations" calculation (in both SCT and SDD Core schemes rulebooks) is to be reviewed / updated.

In fact, under ECB's tracker solution, EONIA will be equal to €STR + Spread (8.5 bp one-off spread calculated and communicated by ECB) starting October 2nd 2019. It has been confirmed by the EMMI that the discontinuation of EONIA is planned for January 3rd 2022.

Is it possible to consider the above-mentioned points and give to banks and credit institutions the possibility to switch to €STR and anticipate the update of their local payment It systems.

Further information on €STR publication date/time and the value of one-off EONIA - €STR spread:

https://www.ecb.europa.eu/paym/initiatives/interest_rate_benchmarks/euro_short-term_rate/html/index.en.html

Further information on EONIA hybrid methodology and publication date/time communicated by the EMMI:

https://www.emmi-benchmarks.eu/assets/files/D0142-2019%20Feedback%20EONIA%20consultation%20RFR%20WG_final.pdf

1.3 Wherever possible, please indicate:

1. Impact on the Scheme in general:

- **SCT scheme rulebook:** 4.4 Inquiry process / ii. Claim for Value Date Correction
- **SDD CORE scheme rulebook:** PT-04.16 – Debtor Bank Sends Collection Refund Instructions to the CSM

2. Impact on the interbank space:

Discontinuation of EONIA starting January 3rd 2022.

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:



5. The nature of the change request:

- a. A change (deleting or replacing an existing Rulebook element by a new one)

Replacing an existing Rulebook element by a new one: replacement of EONIA by €STR **starting January 2022**

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

Rule alongside an existing Rulebook element: to allow banks to make necessary arrangements to smoothly transition to €STR rate, SEPA could consider adding €STR starting **October 2nd 2019** and keep EONIA until **December 2021**

2 Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	NA
Is the change request underpinned by a cost-benefit analysis?	No. However I think the request is in line with both i). the recommendations of ECB Working Group on Euro risk free rates ii). the current EONIA - €STR transition works that are planned by banks
Does the change fit into the strategic objectives for SEPA?	NA
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	Yes, I do think so
Do you consider that the change request does not impede SEPA-wide interoperability?	No, I don't think so
Do you consider that the change request is in the scope of the scheme involved?	Yes. By using EONIA as a reference rate for compensation amounts calculation, SEPA scheme are concerned by the market evolution impacting the IBORs transition (Publication of €STR as the new overnight reference rate and discontinuation of EONIA by the end of 2021)

Template for Proposing a Change Request in a SEPA Payment Scheme



European
Payments Council

EPC 045-18
Version 1.0
19 June 2019

Public
Approved

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**Error! Unknown document property name.
by 31 December 2019**

Name of contributor:	Scheme Evolution and Maintenance Working Group (SEMWG)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	# 07 - Replacement of references to EONIA into €STR
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2019 SEPA Credit Transfer Rulebook Version 1.0 EPC004-16 2019 SEPA Instant Credit Transfer Rulebook Version 1.0 EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	02 December 2019
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules

1. General Description of the Change Request

1.1. Suggested launch date (if any):

21 November 2021 – effectiveness date of the 2021 SCT and SDD Core rulebooks.

1.2. Description of the change request:

The private sector working group on euro risk-free rates for which the ECB provides the secretariat, formally recommended through a press release on 14 March 2019 that market participants gradually replace EONIA with the euro short-term rate (€STR) for all products and contracts, making the €STR their standard reference rate. The market transition from EONIA to the €STR would last until end 2021.

The SCT and SDD Core rulebooks contain references to the EONIA rate. The following concrete changes are proposed in the concerned rulebooks to reflect the transition to €STR:

A. 2019 SCT rulebook version 1.0 – section 4.4.1 SCT inquiry

i. ii. Claim for Value Date Correction:

(..)This compensation is a variable amount, being the interest calculated for the number of calendar days between the original value date and the corrected value date of the original SEPA Credit Transfer. The rate to be applied for each day in a month is the ~~€STR EONIA R~~rate applicable on the first banking business day of that month based on a 360 days year. The ~~€STR EONIA R~~rate is a ~~daily~~rate published by the ECB ~~every day~~.

ii. Chapter 7 Terms defined in the Rulebook

Addition of the following term:

€STR Rate

Is a rate which reflects the wholesale euro unsecured overnight borrowing costs of euro area banks. The rate is published for each TARGET2 business day based on transactions conducted and settled on the previous day (reporting date T) with a maturity date of T+1 and which are deemed to be executed at arm's length and thereby reflect market rates in an unbiased way.

B. 2019 SDD Core rulebook version 1.0

i. Section 4.6.4 Collection of the Direct Debit Transaction (PR-04)

PT-04.16 – Debtor Bank Sends Collection Refund Instructions to the CSM

(..) This compensation is a variable amount, being the interest calculated for the number of Calendar Days between the Settlement Date of the original Collection (Settlement Date is included in the number of days) and the Settlement Date of the Refund instruction by the CSM after presentation by the Debtor Bank (Settlement day is not included in the number of days). The rate

to be applied for each day in a month is the ~~ESTR EONIA R~~ rate applicable on the first Banking Business Day of that month based on a 360 days year. The ~~ESTR EONIA R~~ rate is a ~~daily~~ rate published by the ECB ~~every day~~.

ii. Chapter 7 Terms defined in the Rulebook

~~ESTR EONIA Interest~~ Rate

Is a rate which reflects the wholesale euro unsecured overnight borrowing costs of euro area banks. The rate is published for each TARGET2 business day based on transactions conducted and settled on the previous day (reporting date T) with a maturity date of T+1 and which are deemed to be executed at arm's length and thereby reflect market rates in an unbiased way. A measure of the effective interest rate prevailing in the euro interbank overnight market. It is calculated as a weighted average of the interest rates on unsecured overnight lending transactions denominated in euro, as reported by a panel of contributing banks.

iii. Annex VII e-Mandates - Section 4.5.4 Collection of the Direct Debit Transaction (PR-04)

PT-04.16 – Debtor Bank Sends Collection Refund Instructions to the CSM

(..) This compensation is a variable amount, being the interest calculated for the number of Calendar Days between the Settlement Date of the original Collection (Settlement Date is included in the number of days) and the Settlement Date of the Refund instruction by the CSM after presentation by the Debtor Bank (Settlement day is not included in the number of days). The rate to be applied for each day in a month is the ~~ESTR EONIA R~~ rate applicable on the first Banking Business Day of that month based on a 360 days year. The ~~ESTR EONIA R~~ rate is a ~~daily~~ rate published by the ECB ~~every day~~.

1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

Yes. However, its impact is limited as it does not change anything to the business rules themselves.

2. Impact on the interbank space:

Yes. SCT and SDD Core scheme participants will have to conduct changes in the concerned IT systems feeding other systems with the EONIA rate or calculating the interest compensation for SCT and SDD Core-related r-transactions.

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

No impact.

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

No impact.

5. The nature of the change request:

a. A change (deleting or replacing an existing Rulebook element by a new one)

Yes.

b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

No.

2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	YES. The EONIA rate will be replaced by €STR by the end of 2021.
Is the change request underpinned by a cost-benefit analysis?	NO. Not necessary from the EPC point of view. Reference is made to the public consultation organised by the private sector working group on euro risk-free rates.
Does the change fit into the strategic objectives for SEPA?	YES. It makes that the SCT and SDD Core scheme participants in SEPA all start using the €STR rate at a well-defined 2021 date to calculate interest compensations for specific r-transactions.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES. Reference is made to the public consultation organised by the private sector working group on euro risk-free rates.
Do you consider that the change request does not impede SEPA-wide interoperability?	YES.
Do you consider that the change request is in the scope of the scheme involved?	YES.



Template for Proposing a Change Request in a SEPA Payment Scheme



EPC 045-18
Version 1.0
19 June 2019

Public
Approved

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**Error! Unknown document property name.
by 31 December 2019**

Name of contributor:	Scheme Evolution and Maintenance Working Group (SEMWG)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	# 13 - Removal of references to the e-Mandate operating model
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2019 SEPA Credit Transfer Rulebook Version 1.0 EPC004-16 2019 SEPA Instant Credit Transfer Rulebook Version 1.0 EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	02 December 2019
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules



1. General Description of the Change Request

1.1. Suggested launch date (if any):

21 November 2021 – effectiveness date of the 2021 SDD Core and SDD B2B rulebooks.

1.2. Description of the change request:

With the publication of the e-Mandate e-Operating Model in March 2009, the EPC Plenary approved the establishment and the governance of “EPC Approved Certification Authorities” (CAs).

These CAs would take up a critical role in the e-Mandate e-Operating Model for the two SDD scheme rulebooks. Therefore, the EPC Plenary approved the establishment of the Certification Authority Supervisory Board (CASB). The CASB oversaw the oversight of the approval process for CAs who wished to become EPC approved in offering e-mandate services.

However, not one single candidate CA has applied to become recognised as ‘EPC approved CA’ for the Annex VII e-Mandate service. The EPC therefore disbanded the CASB at the start of 2019.

As the concept of the e-Mandate e-Operating Model itself did not materialize in practice leading to the formal disbandment of the CASB as a key body in this model, the suggestion is to remove all references to this model from both SDD rulebooks.

A. Proposed changes to the 2019 SDD Core rulebook version 1.0

i. Section 0.1 References

	Document Number	Title	Issued by:
(..)			
[9]	EPC109-08	EPC e-Operating Model for e-Mandates	EPC
(..)			
[13]	EPC291-09	Requirements and Specifications for ‘EPC Approved Certification Authorities’ for e-Mandate Services	EPC

Important note: the renumbering of the references in the SDD Core rulebook will also affect the current reference numbers used in Annex VII.

ii. Section 0.5.2: EPC e-Operating Model (only for the e-Mandate option)

Complete removal of this section.

iii. Annex VII e-Mandates

0. Introduction



(..) The description of the e-Mandate feature is contained in the following documents:

1. This Annex of the Core Scheme Rulebook, containing the service description of the e-Mandate solution.
2. The appropriate (ISO 20022) XML message standards for e-Mandate messages defined as a separate document [12].
- ~~3. The description of the Inter-bank transport layer standards to cover rules for issues such as guaranteed delivery, authentication, data integrity, etc., called the EPC e-Operating Model.~~
- ~~4. Requirements and specifications for 'EPC Approved Certification Authorities' for e-Mandate Services.~~

4.1.1. The Mandate

Ninth paragraph:

The Debtor must be the account holder, or a person in possession of a form of authorisation (such as a power of attorney) completed by the necessary technical means, to be authorised to give consent as a Debtor to debiting the account identified through the means of an e-Mandate. The term 'means' is used here in line with the term 'Payment Instrument' used in the Payment Services Directive. The Debtor must identify and authenticate (5) himself according to the instructions received from the Debtor Bank. The Debtor Bank defines and provides the authentication means to be used by the Debtors. ~~This authentication process must be technically compatible with the EPC e-Operating Model for e-Mandates [9].~~ The Debtor Bank and the Debtor should have an agreement on the conditions for use of the means for authentication.

Eleventh paragraph:

The validation process (6) of the Debtor Bank constitutes an e-Mandate according to the following process steps, ~~which are more described in greater detail in the E-Operating Model:~~

(..)

5. The Validation Service verifies the authorization and performs an electronic signature of the XML e-Mandate data ~~using the e-Operating Model X.509 signing certificate issued by an approved EPC Certification Authority.~~

13th paragraph:

The channels accepted are determined by the Creditor and can include the following:

- The Creditor gives access to its Web Site and/or a Web Site hosting the Creditor.
- Any other equivalent electronic channel offering a security level considered sufficient by the Creditor Bank ~~and accepted in the EPC e-Operating Model for e-Mandates (reference [9]).~~

Throughout the entire Annex VII:

Removal of the reference to the term 'SEPA e-Mandate Standards' as follows:



- a) The remark at the end of the process steps PT-07.02 and PT-07.04 (section 4.6.7), PT-08.02 and PT-08.04 (section 4.6.8), and PT-09.02 and PT-09.04 (section 4.6.9):

Remarks	This description reflects business requirements and does not prescribe <u>any</u> technical requirements as defined in the document 'SEPA e-Mandate Standards' .
----------------	---

- b) The remark at the end of the sections 4.7.12 and 4.7.13:

Remarks	These attributes reflect business requirements and do not prescribe <u>any</u> <u>technical requirements</u> fields in the logical or physical layers of the SEPA e-Mandate Standards.
----------------	---

- c) Removal of this term at the end of Chapter 7



B. Proposed changes to the 2019 SDD B2B rulebook version 1.0

i. Section 0.1 References

	Document Number	Title	Issued by:
(..)			
[12]	EPC409-09	EPC List of SEPA Scheme Countries	EPC
[13]	EPC208-08	e-Operating Model detailed specifications	EPC
[14]	EPC109-08	EPC e-Operating Model for e-Mandates	EPC
[15]	EPC392-08	Guidelines for the Appearance of Mandates	EPC

Important note: the renumbering of the references in the SDD B2B rulebook will also affect the current reference numbers used in Annex VII.

ii. Section 0.5.2: EPC e-Operating Model (only for the e-Mandate option)

Complete removal of this section.

iii. Annex VII e-Mandates

0. Introduction

(...)

The description of the e-Mandate feature is contained in the following documents:

- This Annex of the Scheme Rulebook, containing the service description of an e-Mandate solution.
- The appropriate ISO 20022 XML message standards for e-Mandate messages defined as a separate document [10].
- ~~• The description of the Inter-bank transport layer standards to cover rules for issues such as guaranteed delivery, authentication, data integrity, etc., called the EPC e-Operating Model.~~

~~There is a need for EPC-approved Certification Authorities for the routing services and validation services and work on this is underway.~~

4.1.1. The Mandate

Sixth paragraph:

When the Debtor (according to the agreement between the Debtor and the Debtor Bank) needs to be represented by more than one physical person in relation to the Debtor Bank, the validation service refers to the validation of the correct use of the appropriate authentication means of each person in possession of a form of authorisation (such as a power of attorney) from the Debtor to



sign the Mandate on his behalf together with the other authorised person(s). The Scheme allows an open window to collect all authorizations. ~~Time parameters are specified in the E-Operating Model Detailed Specifications [13].~~ The Rulebook refers to 'the Debtor' even when multiple authorised persons are required.

Tenth paragraph:

The Debtor must be the account holder, or a person in possession of a form of authorisation (such as a power of attorney) completed by the necessary technical means, to be authorised to give consent as a Debtor to debiting the account identified through the means of an e-Mandate. The term 'means' is used here in line with the term 'Payment Instrument' used in the Payment Services Directive. The Debtor must identify and authenticate (5) himself according to the instructions received from the Debtor Bank. The Debtor Bank defines and provides the authentication means to be used by the Debtors. ~~This authentication process must be technically compatible with the EPC e-Operating Model for e-Mandates [14].~~ The Debtor Bank and the Debtor should have an agreement on the conditions for use of the means for authentication.

Twelfth paragraph:

The validation process (6) of the Debtor Bank constitutes an E-Mandate according to the following process steps, ~~which are described in more detail in the E-Operating Model:~~

(...)

5a) The Validation Service verifies the authorization

5b) The Validation Service performs an electronic signature of the XML e-Mandate data ~~using the e-Operating Model X.509 signing certificate issued by an approved EPC Certification Authority.~~

6. The Validation Service presents a confirmation message to the Debtor along with the e-Mandate data and a link to the Creditor website.

7. In the multiple authorization option there are two possibilities:

(...)

- The necessary personnel to give authorization are not able to give their authorization in the same session. This means that step 4 and 5a will have to be repeated until the necessary authorizations are collected. In this case there are some extra steps in the process required. Before continuing with step 5b, the Validation Service will have to give the Validation Service e-Mandate Proposal Reference Number to the Debtor along with the e-Mandate data and a link to the Creditor Website. The Creditor will receive the Validation Service e-Mandate Proposal Reference Number and it will pass this to the Debtor. This Validation Service e-Mandate Proposal Reference Number will give the Debtor the possibility to initiate / continue the session on the validation service at a later time until the necessary missing authorization is given. The operational model can continue from step 5b onwards, when all the authorizations necessary for authentication have been provided. ~~For the repeated process steps 4 and 5a there is a limiting time period which is defined in the Detailed Specifications of the E-Operating Model.~~

(...)



14th and 15th paragraphs:

The channels accepted are determined by the Creditor and can include the following:

- The Creditor gives access to its Web Site and/or a Web Site hosting the Creditor.
- Any other equivalent electronic channel offering a security level considered sufficient by the Creditor Bank ~~and accepted in the EPC e-Operating Model for e-Mandates (reference [14]).~~

The connection of the e-Mandate completion on the Creditor's Web-site to the validation service offered by the Debtor Bank can be realised in real-time, including all the steps mentioned above. The whole end-to-end process from (1) to (9) inclusive should be organised in such a way that the Debtor can be guided through the successive steps without unacceptable waiting times between the steps, unless the Debtor needs multiple authentications and the required physical persons are not present. In this case, the Debtor is invited to complete the e-Mandate proposal by giving the necessary authorizations in the time window ~~which is defined in the Detailed Specifications of the E-Operating Model and~~ which is communicated by the Creditor to the Debtor.

Throughout the entire Annex VII:

Removal of the reference to the term 'SEPA e-Mandate Standards' as follows:

- a) The remark at the end of the process steps PT-07.02 and PT-07.04 (section 4.6.7), PT-08.02 and PT-08.04 (section 4.6.8), and PT-09.02 and PT-09.04 (section 4.6.9):

Remarks	This description reflects business requirements and does not prescribe <u>any</u> technical requirements as defined in the document 'SEPA e-Mandate Standards'.
----------------	--

- b) The remark at the end of the sections 4.7.12 and 4.7.13:

Remarks	These attributes reflect business requirements and do not prescribe <u>any</u> technical requirements fields in the logical or physical layers of the SEPA e-Mandate Standards.
----------------	---

- c) Removal of this term at the end of Chapter 7

4.6.7 Issuing the e-Mandate (PR-07)

PT-07.03

(...)

The e-Mandates optional Scheme offers the possibility, if needed, to use multiple authorizations in the e-Mandate proposal (see PT-07.03bis). These multiple authorizations will occur in a time window to allow necessary additional authorizations for the e-Mandate proposal. ~~The time window is defined in the Detailed Specifications of the E-Operating Model.~~



PT-07.03bis

(...)

The required persons to give authorization are not able to give their authorization in the same session. In this case there are some extra steps in the process required. Before continuing with PT-07.04, the Validation service will have to inform the Debtor with the Validation Service e-Mandate Proposal Reference Number along with the e-Mandate data and a link to the Creditor Website. The Creditor will receive the Validation Service e-Mandate Proposal Reference Number and it will pass this to the Debtor. This Validation Service e-Mandate Proposal Reference Number will give the Debtor the possibility to initiate / continue the session with the Validation Service later until the necessary missing authorization is given. When all the authorizations necessary for authentication have been provided, the operational model can be continued from PT-07.04 onwards. ~~For the repeated process PT-07-03bis there is a limiting time period which is defined in the Detailed Specifications of the E-Operating Model.~~

4.6.8 Amendment of the e-Mandate (PR-08)

PT-08.03

(...)

The e-Mandates optional Scheme of offers the possibility, if needed, to use multiple authorizations in authenticating the e-Mandate amendmentproposal (see PT-08.03bis). These multiple authorizations will occur in a time window to allow necessary additional authorizations for the e-Mandate amendmentproposal. ~~The time window is defined in the Detailed Specifications of the E-Operating Model.~~

PT-08.03bis

(...)

The required persons to give authorization are not able to give their authorization in the same session. In this case there are some extra steps in the process required. Before continuing with PT-08.04, the Validation service will have to inform the Debtor with the Validation Service e-Mandate Amendment Proposal Reference Number along with the amended e-Mandate data and a link to the Creditor Website. The Creditor will receive the Validation Service e-Mandate Amendment Proposal Reference Number and it will pass this to the Debtor. This Validation Service e-Mandate Amendment Proposal Reference Number will give the Debtor the possibility to initiate / continue the session with the Validation Service later until the necessary missing authorization is given. When all the authorizations necessary for authentication have been provided, the operational model can be continued from PT-08.04 onwards. ~~For the repeated process PT-07-03bis there is a limiting time period which is defined in the Detailed Specifications of the E-Operating Model.~~



4.6.9 Cancellation of the e-Mandate (PR-09)

PT-09.03

(...)

The e-Mandates optional Scheme of offers the possibility, if needed, to use multiple authorizations in authenticating the e-Mandate ~~cancellationproposal~~ (see PT-098.03bis). These multiple authorizations will occur in a time window to allow necessary additional authorizations for the e-Mandate ~~cancellationproposal~~. ~~The time window is defined in the Detailed Specifications of the E-Operating Model.~~

PT-09.03bis

(...)

The required persons to give authorization are not able to give their authorization in the same session. In this case there are some extra steps in the process required. Before continuing with PT-097.04, the Validation service will have to inform the Debtor with the Validation Service e-Mandate ~~CancellationProposal~~ Reference Number along with the e-Mandate data and a link to the Creditor Website. The Creditor will receive the Validation Service e-Mandate ~~CancellationProposal~~ Reference Number and it will pass this to the Debtor. This Validation Service e-Mandate ~~CancellationProposal~~ Reference Number will give the Debtor the possibility to initiate / continue the session with the Validation Service later until the necessary missing authorization is given. When all the authorizations necessary for authentication have been provided, the operational model can be continued from PT-097.04 onwards. ~~For the repeated process PT-07-03bis there is a limiting time period which is defined in the Detailed Specifications of the E-Operating Model.~~

1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

Yes. The SDD Core and B2B scheme participants are no longer obliged to follow a specific and detailed operating model when they wish to offer the Annex VII e-Mandate option to their Creditors and Debtors.

2. Impact on the interbank space:

No.

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

No.

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

No impact.

5. The nature of the change request:



- a. A change (deleting or replacing an existing Rulebook element by a new one)

Yes.

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

No.

2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	YES. SDD scheme participants have more flexibility in defining or choosing an alternative operating model that would meet the requirements by the Annex VII e-Mandate option.
Is the change request underpinned by a cost-benefit analysis?	NO. Not necessary.
Does the change fit into the strategic objectives for SEPA?	YES. It can facilitate the further development of e-Mandate solutions that follow to a very large extent the Annex VII e-Mandate option.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES. Refer to the answers 1 and 3.
Do you consider that the change request does not impede SEPA-wide interoperability?	YES.
Do you consider that the change request is in the scope of the scheme involved?	YES.

Template for Proposing a Change Request in a SEPA Payment Scheme



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by 31 December 2019**

Name of contributor:	Scheme Evolution and Maintenance Working Group (SEMWG)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	# 16 - Alignment of all attribute numbers across all EPC SEPA scheme rulebooks
Scheme and document and version number:	Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to: EPC125-05 2019 SEPA Credit Transfer Rulebook Version 1.0 EPC004-16 2019 SEPA Instant Credit Transfer Rulebook Version 1.0 EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	02 December 2019
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules



1. General Description of the Change Request

1.1. Suggested launch date (if any):

November 2022.

1.2. Description of the change request:

Each SEPA payment scheme rulebook describes a range of attributes (ATs) which compose a dataset to be used to execute a certain rulebook process. Under each rulebook, each AT has a unique sequence number. However, many AT descriptions are identical or similar in all four rulebooks but they all bear a different unique sequence number in each rulebook.

The proposal is to align the sequence number of these ATs between the four rulebooks. This suggestion also includes the grouping of ATs and their subsequent sequence numbering into different AT sequence number categories. Each such category has its own sequence number structure.

Persons in charge of the implementation and maintenance of the SEPA usage rules in the customer-to-bank (C2B) and interbank systems, will get the same understanding about each AT sequence number in the SEPA usage rules of all C2B and interbank implementation guidelines (IGs). It also helps the EPC in its future management of the AT sequence numbering.

The table attached to this change request lists the following data:

- The defined ATs from each rulebook with their current sequence numbers
- The alignment of identical or similar ATs across the four schemes
- The proposed new AT sequence number for each AT in each rulebook

The SEMWG understands that such renumbering can impact individual scheme participants and payment end-users. They can use the current AT numbering in e.g., their technical implementation documentation and in technical and business processes.

As this change concerns a **format** change but not a change to any functional or business rules, the SEMWG proposes to isolate the implementation of this change from the other accepted changes for the 2021 EPC SEPA payment scheme rulebooks. The SEMWG proposes to implement this change in November 2022.

If this change is accepted, two sets of 2021 EPC SEPA payment scheme rulebooks will be published:

- One set entering into force in November 2021 published in November 2020;
- A second set entering into force in November 2022 published in the course of 2021 covering the attribute re-alignment.

This second set may also include the change request #20 from the EPC on the migration to the 2019 version of the ISO 20022 messaging standard in case also this change request is accepted.



1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

No impact. This change does not affect the business, technical or usage rules of each scheme. It only aligns the sequence number of each AT in each rulebook.

2. Impact on the interbank space:

No impact assumed.

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

No impact. It only aligns the sequence number of each AT in the specified SEPA usage rules in the C2B and interbank IGs.

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

No impact.

5. The nature of the change request:

- a. A change (deleting or replacing an existing Rulebook element by a new one)

Yes. Renumbering of the AT sequence numbers.

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

No.



2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	YES. It harmonises the sequence number of each AT across all four rulebooks. Persons in charge of the implementation and maintenance of the SEPA usage rules in the C2B and interbank systems, will get the same understanding about each AT sequence number in the SEPA usage rules of the C2B and interbank IGs for all four EPC SEPA payment scheme rulebooks. It also helps the EPC in its future management of the AT sequence numbering.
Is the change request underpinned by a cost-benefit analysis?	NO. Not necessary from the EPC point of view. It does not imply any costs for the scheme participants.
Does the change fit into the strategic objectives for SEPA?	YES. It provides an unambiguous meaning about each AT sequence number for all four EPC SEPA payment scheme rulebooks.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES. It is just a renumbering of the AT sequence numbers in the rulebooks and in the IGs.
Do you consider that the change request does not impede SEPA-wide interoperability?	YES.
Do you consider that the change request is in the scope of the scheme involved?	YES.

EPC SEPA payment Schemes - AT-list comparison - Proposal of AT organisation and renumbering

SCT		SCT Inst	Proposed AT n°	SDD Core	SDD B2B
Payer details ("P" attributes standing for the Parties involved in the payment (Payer, Payee and their respective PSPs))					
AT-02 The name of the Originator	AT-02 The name of the Originator		AT-P01	AT-14 The name of the Debtor	AT-14 The name of the Debtor
AT-03 The address of the Originator	AT-03 The address of the Originator		AT-P02	AT-09 The address of the Debtor	AT-09 The address of the Debtor
AT-10 The Originator identification code	AT-10 The Originator identification code		AT-P03	AT-27 Debtor identification code	AT-27 Debtor identification code
AT-08 The name of the Originator Reference Party	AT-08 The name of the Originator Reference Party		AT-P04	AT-15 The name of the Debtor reference Party	AT-15 The name of the Debtor reference Party
AT-09 The identification code of the Originator Reference Party	AT-09 The identification code of the Originator Reference Party		AT-P05	AT-37 The identification code of the Debtor Reference Party	AT-37 The identification code of the Debtor Reference Party
For future use	For future use		AT-P06	For future use	For future use
			AT-P07		
			AT-P08		
			AT-P09		
			AT-P10		
			AT-P11		
			AT-P12		
			AT-P13		
			AT-P14		
			AT-P15		
			AT-P16		
			AT-P17		
			AT-P18		
			AT-P19		
			AT-P20		
Payee details ("P" attributes standing for the Parties involved in the payment (Payer, Payee and their respective PSPs))					
AT-21 The name of the Beneficiary	AT-21 The name of the Beneficiary		AT-P21	AT-03 The name of the Creditor	AT-03 The name of the Creditor
AT-22 The address of the Beneficiary	AT-22 The address of the Beneficiary		AT-P22	AT-05 The address of the Creditor	AT-05 The address of the Creditor
AT-24 The Beneficiary identification code	AT-24 The Beneficiary identification code		AT-P23	AT-02 The identifier of the Creditor	AT-02 The identifier of the Creditor
AT-28 The name of the Beneficiary Reference Party	AT-28 The name of the Beneficiary Reference Party		AT-P24	AT-38 The name of the Creditor Reference Party	AT-38 The name of the Creditor Reference Party
AT-29 The identification code of the Beneficiary Reference Party	AT-29 The identification code of the Beneficiary Reference Party		AT-P25	AT-39 The identification code of the Creditor Reference Party	AT-39 The identification code of the Creditor Reference Party
For future use	For future use		AT-P26	For future use	For future use
			AT-P27		
			AT-P28		
			AT-P29		
			AT-P30		
			AT-P31		
			AT-P32		
			AT-P33		
			AT-P34		
			AT-P35		
			AT-P36		
			AT-P37		
			AT-P38		
			AT-P39		
			AT-P40		
Payer PSP's details ("P" attributes standing for the Parties involved in the payment (Payer, Payee and their respective PSPs))					
AT-01 The IBAN of the account of the Originator	AT-01 The IBAN of the account of the Originator		AT-P41	AT-07 The IBAN of the account number (IBAN) of the Debtor	AT-07 The IBAN of the account number (IBAN) of the Debtor
AT-06 The BIC code of the Originator Bank	AT-06 The BIC code of the Originator Bank		AT-P42	AT-13 BIC code of the Debtor Bank	AT-13 BIC code of the Debtor Bank
For future use	For future use		AT-P43	For future use	For future use
			AT-P44		
			AT-P45		
			AT-P46		
			AT-P47		

SCT	SCT Inst	Proposed AT n°	SDD Core	SDD B2B
		AT-P48 AT-P49 AT-P50		
Payee PSP's details ("P" attributes standing for the Parties involved in the payment (Payer, Payee and their respective PSPs))				
AT-20 The IBAN of the account of the Beneficiary AT-23 The BIC code of the Beneficiary Bank <i>For future use</i>	AT-20 The IBAN of the account of the Beneficiary AT-23 The BIC code of the Beneficiary Bank <i>For future use</i>	AT-P51 AT-P52 AT-Pxx	AT-04 The IBAN of the account number (IBAN) of the Creditor AT-12 BIC code of the Creditor Bank <i>For future use</i>	AT-04 The IBAN of the account number (IBAN) of the Creditor AT-12 BIC code of the Creditor Bank <i>For future use</i>
Payment instruction details ("T" attributes standing for the attributes of the Transaction in the C2B and the interbank spaces)				
AT-40 The identification code of the Scheme AT-04 The amount of the SEPA Credit Transfer in euro	AT-40 The identification code of the SCT Inst Scheme AT-04 The amount of the SCT Inst in euro	AT-T01 AT-T02	AT-20 The identification code of the Scheme AT-06 The amount of the Collection in euro	AT-20 The identification code of the B2B Scheme AT-06 The amount of the Collection in euro
AT-05 The Remittance Information sent by the Originator to the Beneficiary in the Credit Transfer Instruction AT-61 The unstructured Remittance Information sent by the Originator to the Beneficiary in the SEPA Credit Transfer Instruction (ERI option) AT-62 The structured Remittance Information sent by the Originator to the Beneficiary in the SEPA Credit Transfer Instruction (ERI option)	AT-05 The Remittance Information sent by the Originator to the Beneficiary in the SCT Inst Instruction	AT-T03	AT-22 The Remittance Information sent by the Creditor to the Debtor in the Collection	AT-22 The Remittance Information sent by the Creditor to the Debtor in the Collection
AT-07 The Requested Execution Date of the Credit Transfer Instruction AT-41 The Originator's reference of the Credit Transfer Transaction	AT-07 The Requested Execution Date of the SCT Inst Instruction AT-41 The Originator's reference of the SCT Inst Instruction	AT-T04 AT-T05		
		AT-T06	AT-11 The Due Date of the Collection	AT-11 The Due Date of the Collection
		AT-T07		
AT-44 The purpose of the SEPA Credit Transfer	AT-44 The purpose of the SCT Inst Instruction	AT-T08 AT-T09	AT-10 The Creditor's reference of the Direct Debit Transaction AT-58 The purpose of the Collection	AT-10 The Creditor's reference of the Direct Debit Transaction AT-58 The purpose of the Collection
AT-45 The category purpose of the SEPA Credit Transfer	AT-45 The category purpose of the SCT Inst Instruction	AT-T10	AT-59 The category purpose of the Collection	AT-59 The category purpose of the Collection
		AT-T11 AT-T12 AT-T13 AT-T14 AT-T15 AT-T16 AT-T17 AT-T18 AT-T19 AT-T20 AT-T21 AT-T22 AT-T23 AT-T24 AT-T25 AT-T26 AT-T27 AT-T28 AT-T29 AT-T30	AT-18 The identifier of the original Creditor who issued the Mandate AT-19 The unique Mandate reference as given by the original Creditor who issued the Mandate AT-17 The type of Mandate (paper, e-Mandate) <i>For future use</i>	AT-18 The identifier of the original Creditor who issued the Mandate AT-19 The unique Mandate reference as given by the original Creditor who issued the Mandate AT-17 The type of Mandate (paper, e-Mandate) <i>For future use</i>
<i>For future use</i>	<i>For future use</i>			
Interbank transaction details ("T" attributes standing for the attributes of the Transaction in the interbank spaces)				
AT-42 The Settlement Date of the SEPA Credit Transfer	AT-42 The Settlement Date of the SCT Inst Transaction	AT-T31	AT-26 The Settlement Date of the Collection	AT-26 The Settlement Date of the Collection

SCT		SCT Inst	Proposed AT n°	SDD Core	SDD B2B
AT-43 The Originator Bank's reference of the SEPA Credit Transfer Transaction		AT-43 The Originator Bank's reference of the SCT Inst Transaction message	AT-T32	AT-43 The Creditor Bank's reference of the Collection	AT-43 The Creditor Bank's reference of the Collection
		AT-50 Time Stamp of the SCT Inst Transaction	AT-T33		
		AT-51 The Beneficiary Bank's reference of the SCT Inst Transaction (status ID)	AT-T34		
For future use		For future use	AT-Txx	For future use	For future use
Mandate information details					
			AT-M01	AT-01 The unique Mandate reference	AT-01 The unique Mandate reference
			AT-M02	AT-08 The identifier of the underlying contract	AT-08 The identifier of the underlying contract
			AT-M03	AT-21 The transaction type	AT-21 The transaction type
			AT-M04	AT-25 The date of signing of the Mandate	AT-25 The date of signing of the Mandate
			AT-M05	AT-33 The signature(s) of the Debtor(s)	AT-33 The signature(s) of the Debtor(s)
			AT-M06	AT-16 The placeholder for the electronic signature data	AT-16 The placeholder for the electronic signature data
			AT-M07	AT-24 The reason for amendment of the Mandate	AT-24 The reason for amendment of the Mandate
			AT-M08	AT-36 The signing date of the cancellation of the Mandate	AT-36 The signing date of the cancellation of the Mandate
			AT-M09	For future use of new generic ATs	For future use of new generic ATs
			AT-M10	For future use of new generic ATs	For future use of new generic ATs
			AT-M11	AT-29 The message type submitted in the Debtor validation request (issuing, amendment, cancellation) (e-mandate specific)	AT-29 The message type submitted in the Debtor validation request (issuing, amendment, cancellation) (e-mandate specific)
			AT-M12	AT-60 The reference of the validation made by the Debtor Bank (e-mandate specific)	AT-60 The reference of the validation made by the Debtor Bank (e-mandate specific)
			AT-M13	AT-61 - The result of the Debtor validation (e-mandate specific)	AT-61 The result of the Debtor validation (e-mandate specific)
			AT-Mxx	For future use	For future use
Inquiry details					
AT-80 The SCT inquiry reason code			AT-Q01		
AT-81 The specific SCT inquiry reference of the Participant initiating the SCT inquiry			AT-Q02		
AT-82 Additional Information to AT-80 SCT inquiry reason code			AT-Q03		
AT-83 Non-receipt of the SEPA Credit Transfer/ non-execution due to regulatory reason			AT-Q04		
AT-84 New value date of the SEPA Credit Transfer based on the new settlement date			AT-Q05		
AT-85 The interest compensation recovered by the Beneficiary Bank from the Originator Bank			AT-Q06		
AT-86 Fee for handling the SCT inquiry			AT-Q07		
For future use			AT-Qxx		
Generic r-transaction details					
AT-R1 The type of "R" message	AT-R1 The type of "R" message		AT-R01	AT-R1 Type of "R" message	AT-R1 Type of "R" message
AT-R2 The identification of the type of party initiating the "R" message	AT-R2 The identification of the type of party initiating the "R" message		AT-R02	AT-R2 Identification of the type of party initiating the "R" message	AT-R2 Identification of the type of party initiating the "R" message
AT-R3 The reason code for non-acceptance of the SEPA Credit Transfer	AT-R3 The reason code for non-acceptance of the SCT Inst		AT-R03	AT-R3 The reason code for non-acceptance	AT-R3 The reason code for non-acceptance
AT-R5 The specific reference of the Bank initiating the Reject/Return	AT-R4 The specific reference of the party initiating the Reject		AT-R04	AT-R5 Specific reference of the bank initiating the Reject/Return/Refund for Reject/Return/Refund.	AT-R5 The Specific reference of the bank initiating the Reject/Return for Reject/Return.
AT-R4 The Settlement Date for the Return			AT-R05	AT-R4 The Settlement Date for the Return or Refund instruction (DS-05) or the Reversal (DS-07)	AT-R4 The Settlement Date for the Return instruction (DS-05) or the Reversal (DS-07)
			AT-R06	AT-R6 The Refund compensation recovered by the Debtor Bank from the Creditor Bank	
For future use	For future use		AT-R07	AT-R8 The amount of the Interchange Fee	AT-R8 The amount of the Interchange Fee
			AT-R08	For future use	For future use
			AT-R09		
			AT-R10		

SCT	SCT Inst	Proposed AT n°	SDD Core	SDD B2B
		AT-R11 AT-R12 AT-R13 AT-R14 AT-R15 AT-R16 AT-R17 AT-R18 AT-R19 AT-R20		
r-tx - Claim unauth. tx. (SDD Core) // inquiry procedure (SDD B2B only - could also be part of inquiry group)				
		AT-R21 AT-R22 AT-R23 AT-R24 AT-R25 AT-R26 AT-R27 AT-R28 AT-R29 AT-R30 AT-R31 AT-R32 AT-R33 AT-R34 AT-R35 AT-R36 AT-R37 AT-R38 AT-R39 AT-R40	AT-45 The Debtor Bank's reference of the request AT-46 The Refund request type code AT-47 The Date of receipt of the request by the Debtor Bank AT-48 The Date of sending the request by the Debtor Bank AT-49 The Name of the Debtor Bank AT-50 The Debtor Bank contact details AT-51 The email address or fax number of the Debtor Bank where the copy of the Mandate should be sent AT-52 The indication that a confirmation of the receipt of the request by the Creditor Bank is requested (yes/no) AT-53 The Debit date of the Collection AT-54 The latest Collection Date AT-55 The Cancellation Date AT-56 The Reference of the response of the Creditor AT-57 The Response type codes <i>For future use</i>	AT-45 The Debtor Bank's reference of the request AT-47 The Date of receipt of the request by the Debtor Bank AT-48 The Date of sending the request by the Debtor Bank AT-49 The Name of the Debtor Bank AT-50 The Debtor Bank contact details AT-51 The email address or fax number of the Debtor Bank where the response should be sent AT-52 The indication that a confirmation of the receipt of the request by the Creditor Bank is requested (yes/no) AT-53 The Debit date of the Collection AT-54 The latest Collection Date AT-56 The Reference of the response of the Creditor AT-57 The Response type codes <i>For future use</i>
SDD reversal details				
		AT-R41 AT-R42 AT-R43 AT-R44 AT-R45 AT-R46 AT-R47 AT-R48 AT-R49 AT-R50	AT-31 The Reversal reason code AT-44 The amount of the Reversal in euro AT-R7 The specific reference of the Creditor Bank for the Reversal <i>For future use</i>	AT-31 The Reversal reason code AT-44 The amount of the Reversal in euro AT-R7 The specific reference of the Creditor Bank for the Reversal <i>For future use</i>
Recall and related Response				
AT-48 The Recall reason code	AT-48 The Recall reason code	AT-R50		
AT-49 Additional Information to AT-48 The Recall reason code	AT-49 Additional Information to AT-48 The Recall reason code	AT-R51		
AT-R7 The specific reference of the Bank initiating the Recall	AT-R6 The specific reference of the bank initiating the Recall	AT-R52		
AT-46 The returned amount of the positive answer to the Recall in euro	AT-46 The returned amount of the positive answer to the Recall in euro	AT-R53		
AT-47 The fee for the positive answer to the Recall in euro	AT-47 The fee for the positive answer to the Recall in euro	AT-R54		

SCT	SCT Inst	Proposed AT n°	SDD Core	SDD B2B
AT-R6 The Reason code for non-acceptance of the Recall AT-R8 The Settlement Date for the positive Answer to the Recall <i>For future use</i>	AT-R5 The Reason code for non-acceptance of the Recall AT-R7 The Settlement Date for the positive Answer to the Recall <i>For future use</i>	AT-R55 AT-R56 AT-R57 AT-R58 AT-R59 AT-R60 AT-R61 AT-R62 AT-R63 AT-R64 AT-R65 AT-R66 AT-R67 AT-R68 AT-R69 AT-R70		
RFRO and related Response				
AT-50 Reason code for the Request for Recall by the Originator AT-51 The specific reference of the Originator Bank for the Request for Recall by the Originator AT-52 Additional Information to AT-50 Reason code for the Request for Recall by the Originator AT-53 The returned amount of the positive answer to the Request for Recall by the Originator in euro AT-54 The settlement date for the positive answer to the Request for Recall by the Originator AT-55 Reason code for non-acceptance of the Request for Recall by the Originator AT-56 Fee for the positive response to a Request for Recall by the Originator in euro AT-57 Provision of all information available to file a legal claim to recover the funds in case of reason code 'wrong unique identifier of the Beneficiary account'	AT-52 Reason code for the Request for Recall by the Originator AT-53 The specific reference of the Originator Bank for the Request for Recall by the Originator AT-54 Additional Information to AT-52 Reason code for the Request for Recall by the Originator AT-55 The returned amount of the positive answer to the Request for Recall by the Originator in euro AT-56 The Settlement Date for the positive answer to the Request for Recall by the Originator AT-57 Reason code for non-acceptance of the Request for Recall by the Originator AT-58 Fee for the positive response to a Request for Recall by the Originator in euro AT-59 Provision of all information available to file a legal claim to recover the funds in case of reason code 'wrong unique identifier of the Beneficiary account'	AT-R71 AT-R72 AT-R73 AT-R74 AT-R75 AT-R76 AT-R77 AT-R78		

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for proposing a change request in a SEPA Payment Scheme

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by 31 December 2019

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Your reference:	FT-D6.3-1
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules



1 General Description of the Change Request

1.1 Suggested launch date (if any):

Next release cycle of the SEPA Direct Debit Rulebooks.

1.2 Description of the change request:

Within the SEPA Direct Debit scheme rulebooks, processing of the optional e-Mandates is specified in the EPC208-08 "e-Operating Model detailed specifications" version 1.2 dated April 2013. As indicated in the SEPA DD core rulebook *«the e-Operating Model covers aspects such as guaranteed delivery, non-repudiation of emission/reception, authentication of sender, data integrity, encryption [...]»*

From the date it was released, at least two significant events happened:

- The rollout of eIDAS, which introduced a common trust framework at EU level. The regulation is accompanied by several ETSI technical standards, which helped to develop an ecosystem of eIDAS trust service providers, cross-border connecting building blocks and solution developers.
- PSD2 was approved, introducing new payment initiation and account information services.

Given the current landscape, we propose the following change requests:

1. Extend the messages defined in EPC208-08 to, at the sole discretion of the Debtor Bank, allow the electronic signature of the e-Mandate by the Debtor (through an individual qualified certificate, e.g. eID, cloud-based certificate), in addition to the electronic signature (or seal, as introduced by eIDAS) by the Debtor Bank.
2. Replace the proprietary certificate profiles defined in EPC208-08 by the PSD2 certificate profiles defined in ETSI TS 119 495 "Qualified Certificate Profiles and TSP Policy Requirements under the payment services Directive (EU) 2015/2366", according to the certificate usages and PSD2 authorized roles.

1.3 Wherever possible, please indicate:

1. Impact on the Scheme in general:

The impacts on the Scheme are limited to the e-Mandate option.

We foresee a positive impact on the uptake of the e-Mandate option because many stakeholders are in the process of obtaining PSD2 certificates and could reuse them for one additional value-added service.

2. Impact on the interbank space:

No impact is expected – interbank message content is not changed, only the e-Operating envelope is changed.



3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

Depending on the exact technical definition, change request #1 may be backwards compatible, leaving to the option of Debtor Banks to require the additional electronic signature by the Debtor. Should a signature be required, then Routing Services and Creditor/Creditor Banks may want to support the new feature or simply ignore it.

Change request #2 has impacts on existing implementations as the certificate profiles are technically different

Also, EPC291-09 "Requirements and Specifications for 'EPC Approved Certification Authorities' for e-Mandate Services" would render useless and could be discarded. PSD2 certificates can only be issued by Qualified Trust Service Providers (QTSP) listed in the official EU Trust List. By reusing PSD2 certificates, e-Mandates benefit of the same trust and security compliance.

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

Through change request #1, should a Debtor Bank require electronic signature of the e-Mandate by Debtors, it would then keep stronger evidence of commitment of Debtor over the signed e-Mandate. Additionally, it would also work as a means to comply with Strong Customer Authentication requirements.

Change request #2 is neutral.

5. The nature of the change request:

- a. A change (deleting or replacing an existing Rulebook element by a new one)

The request would be a change of EPC208-08, with amendments to specific sections.

Furthermore, EPC291-09, including references to it in other documents, could be deleted.

- b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

2 Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	We foresee that the reuse of PSD2 certificates for the purpose of e-Mandates may be appealing to many important stakeholders. Thousands of banks and TPPs are getting their PSD2 certificates and e-Mandates is one more possible use of that technology asset.
Is the change request underpinned by a cost-benefit analysis?	No formal cost-benefit analysis was assessed. Our expectation is that change request #1 has an additional cost, which may be outweighed by an increased level of compliance with SCA and stronger evidence of commitment by the Debtor. For change request #2, new entrants to e-Mandates will have same or lower costs than before, because existing PSD2 certificate can be reused. For entities with existing e-Mandate solutions, there is a cost of change in the short term, but in the long term management of certificates is simplified – not only the certificates but also system components from the PSD2 APIs can be shared between the different services.
Does the change fit into the strategic objectives for SEPA?	Yes. The proposed changes leverage the existing eIDAS and PSD2 trust infrastructure towards cross-border transactions and payments.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	Yes. It is technically feasible, within a reasonable investment cost. A demonstrator was developed under the H2020 project FutureTrust .
Do you consider that the change request does not impede SEPA-wide interoperability?	Yes. The change requests are actually intended to leverage on existing interoperable frameworks such as eIDAS and PSD2 and increase the adoption of the e-Mandate optional service.
Do you consider that the change request is in the scope of the scheme involved?	Yes. The change requests are applicable to the e-Mandates optional service of SEPA DD. The objective is to leverage the use of eIDAS and PSD2 trust frameworks, by integrating them into the e-Mandates optional service (and possibly other services in SEPA schemes).

Template for Proposing a Change Request in a SEPA Payment Scheme



European
Payments Council

EPC 045-18
Version 1.0
19 June 2019

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Public

Approved

**Error! Unknown document property name.
by 31 December 2019**

Name of contributor:	Scheme Evolution and Maintenance Working Group (SEMWG)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	# 20 - migration to 2019 version of the ISO 20022 messaging standard
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2019 SEPA Credit Transfer Rulebook Version 1.0 EPC004-16 2019 SEPA Instant Credit Transfer Rulebook Version 1.0 EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	02 December 2019
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules



1. General Description of the Change Request

1.1. Suggested launch date (if any):

November 2022.

1.2. Description of the change request:

For the launch of the various EPC SEPA payment schemes in January 2008, November 2009 and November 2017, the EPC selected the 2009 version of the ISO 20022 XML-based messaging standard.

The EPC notes new payment market developments for which the 2009 version of the ISO standard is not suitable to support:

- All schemes: need for a standard structured delivery of the address details about the payer and the payee. The current lack of such structured address details hinders a more automated screening of SEPA transactions to or from non-EEA SEPA-country based scheme participants. The capacity of characters for these fields under the 2009 version also reaches its limits in certain payment situations.
- Both SCT schemes: no possibility to support the development of Request-to-Pay (RTP) services and the use of proxy identifiers (e.g., phone number, e-mail address) in the customer-to-bank (C2B) space. In case the EPC develops a framework or a dedicated rulebook to support RTP, the selected messages will be based on the 2019 version of the ISO 20022 standard.
- SCT Inst scheme:
 - The timestamp data element for an SCT Inst payment transaction message supports only the provision of a future date. The possibility to submit SCT Inst instructions with a combination of a future execution date and time can be interesting for certain customers or in certain use cases.
 - The 2009 version is not rich enough in data elements and element characteristics to support the uptake of the SCT Inst scheme at different Point-of-Interaction use cases between payers and payees.

Throughout the years, the EPC SEPA payment schemes cover already a variety of ISO 20022 versions for messages between these payment schemes. The table below summarises the actual variety.



Scheme	ISO 2009	ISO 2017	ISO 2018	ISO 2019
SCT	Various C2B interbank msg	pacs.028: status update msg for Recall, RFRO & inquiries	camt. msg 029, .087 & .027 for inquiries	pain.013 for Request-to-Pay*
SCT Inst	Various C2B interbank msg	pacs.028: status update msg for Recall, RFRO & SCT Inst tx msg not confirmed after 25"	N/A	pain.013 for Request-to-Pay*
SDD Core	Various C2B interbank msg	N/A	N/A	N/A
SDD B2B	Various C2B interbank msg	N/A	N/A	N/A

* Not (yet) included in the SCT schemes but the EPC's 2018 change request for this message was accepted by ISO.

If the future rulebooks would include new business procedures or existing procedures could be amended or extended, messages based on a more recent ISO 20022 version may have to be used adding further variety.

The EPC proposes to migrate the four schemes to the 2019 version of the ISO 20022 standard as it is suitable to support all above-mentioned new payment features and to align all current rulebook messages on one and the same ISO 20022 version.

The EPC notes the decision by several market infrastructures to migrate to the ISO 20022 standard i.e. Target2 from Eurosystem and EURO1 from EBA Clearing by November 2021 and the global migration of SWIFT from its FIN messages to the ISO 20022 standard starting from November 2021 until November 2025. These infrastructures have decided to use the 2019 version of the ISO 20022 standard.

The use of the same version of the ISO 20022 standard for mass-volume SEPA payments, high-value euro payments and international payments facilitates the interoperability between the various payment schemes and platforms for the EPC SEPA payment scheme participants and their (mainly corporate) customers.

However, the EPC proposes to migrate the four schemes as of **November 2022** to the 2019 version. This migration date allows the EPC SEPA payment scheme participants to spread the workload. Otherwise, they would have to change three (possibly four) different payment systems or platforms by November 2021: the SCT and SDD payment engines, the high-value payment systems connected to Target2 (ECB) and EURO1 (EBA Clearing) and possibly the international payment systems connected to the SWIFT network. Handling the ISO version migration for the four EPC SEPA payment schemes by November 2021 on top of those planned migrations, would be a huge challenge.

Subject to a positive public consultation outcome on this change request, the EPC will formally communicate this ISO version migration in November 2020 when publishing the 2021 EPC SEPA payment scheme rulebooks and the related Implementation Guidelines (IGs).

The IGs published in November 2020 will still be predominantly¹ based on the 2009 version of ISO 20022 and will be applicable from November 2021 to November 2022. A second set of 2021 IGs

¹ Some messages described in the IGs are based on a more recent version of ISO 20022 (see table above).



will be published latest in the second quarter of 2021. This second cluster of the mandatory C2B and interbank IGs will then be based on the 2019 version of the ISO 20022 standard.

The ISO version migration will be a big-bang migration, i.e. no transitional period will be foreseen. This means that all EPC SEPA payment scheme participants offering ISO 20022 message-based payment services to their customers, must then support the 2019 version as of November 2022.

On the other hand, the (corporate) customers may still use another ISO version to exchange SEPA transactions in an XML format with their PSPs if so bilaterally agreed.

The annex of this change request covers a high-level gap analysis between the 2009 and the 2019 pain., pacs. and camt. messages used in the four EPC SEPA payment scheme rulebooks.

1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

Yes. Although this change request does not affect any change in the business rules or in the obligations of the scheme participants, all EPC SEPA payment scheme participants must migrate to the 2019 version of the ISO 20022 messages used in the interbank space.

Those scheme participants that also offer ISO 20022 message-based payment services to their customers, must migrate to the 2019 version of the ISO 20022 messages used in the customer-to-bank space.

2. Impact on the interbank space:

Yes. See point 1.

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

Yes. See point 1.

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

No impact.

5. The nature of the change request:

a. A change (deleting or replacing an existing Rulebook element by a new one)

Yes. All pain., pacs. and camt. messages currently used in the four EPC SEPA payment schemes will migrate to the 2019 version of the ISO 20022 standard.

b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

No.



2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	YES. It allows the EPC to launch much faster new/ adapted ISO messages, specific fields and/or usage rules provided by a newer ISO version which can add value for scheme participants and/or payment end users. This change request maintains the attractiveness and the relevance of the four EPC SEPA payment schemes for the next years.
Is the change request underpinned by a cost-benefit analysis?	NO. The EPC is not in the possibility to make this assessment. On the other hand, the costs and benefits related to the efforts to move along with the migration of the market infrastructures Target2, EURO1 and SWIFT MT to the ISO 20022 standard can provide some guidance.
Does the change fit into the strategic objectives for SEPA?	YES. This change request maintains the attractiveness and the relevance of the four EPC SEPA payment schemes for the next years.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES. In the run-up to the SEPA migration during the period 2012-2014, all financial institutions offering euro-denominated payment services managed to migrate their legacy schemes to ISO 2002 message-based payment schemes.
Do you consider that the change request does not impede SEPA-wide interoperability?	YES.
Do you consider that the change request is in the scope of the scheme involved?	YES.



Gap Analysis ISO 20022 Message Version Migration (2009 vs 2019)

Annex to change request #20 “EPC-migration to 2019
version of the ISO 20022 messaging standard



Main differences in ISO 20022 messages used in SEPA (1/3)

Inclusion of a Legal Entity identifier (LEI) as an alternative identifier for a ‘non-private’ party (for example as an alternative to BICFI).

- Available under ‘Financial institution ID’, ‘Organisation ID and ‘Branch ID’.
- EPC assessment:
 - This has no impact on the rulebook attributes (e.g. Originator/Beneficiary Identification Code) because the LEI can already be provided in the 2009 message version under ‘Other’ (‘Identification’ and ‘Scheme Name’).
 - In case of migration to the 2019 message version, this could however introduce two different ways to instruct the LEI depending on the version of the C2B message received and hence could result in two different ways to transport the LEI in the inter-PSP sphere (either in dedicated LEI element or in ‘Other’).

BIC data elements change: “BIC or BEI” (2009) replaced by “ANYBIC” (2019) and “BIC” (2009) replaced by “BICFI” (2019).

- EPC assessment: This is already the case in some messages used in the current implementation guidelines (IGs) (e.g. pacs.028 used as a request for a status update on a Recall and camt.027/camt.08 used for inquiry related messages).

Cardinality of “Service Level” element: Maximum 1 occurrence in version 2009 versus “n” occurrences in version 2019

- EPC assessment: No immediate impact (IGs can limit to 1 occurrence) but could be potentially used in the future.

Split between ‘Party’ and ‘Agent’ in R-messages (for example in elements ‘Debtor’ and ‘Creditor’ under ‘Original Transaction Reference’): ‘Party’ specifies the identification of a person or an organisation, ‘Agent’ specifies the identification of a financial institution.

- EPC assessment: Only ‘Party’ should be used in the IGs.



Main differences in ISO 20022 messages used in SEPA (2/3)

Possibility to use a proxy for the identification of an account.

- EPC assessment: The proxy can only be provided in addition to the usual account identification (i.e. IBAN). This could be useful in the future to accommodate developments in other workstreams.

Extension of the structured elements of 'postal address'.

- EPC assessment: Currently only one of those i.e. 'country code' is used (besides the unstructured address lines). In case of a future alignment to market (e.g. CBPR+) requirements or of a legal need to structure the address, then the 2019 ISO message version would be more complete than the 2009 ISO message version.

Additional sub-elements under data element 'contact details': Email purpose; job title; responsibility; department + contact details in another form (e.g.: preferred method used to reach the contact).

- EPC assessment: Contact details are currently not used in the SEPA schemes.

New sub-element 'UETR' ('Unique End-to-End Transaction Reference', Universally unique identifier to provide an end-to-end reference of a payment transaction) under 'Payment Identification' (note: 'Original UETR' in reject messages).

- This comes from the SWIFT Global Payment Initiative (GPI), i.e. the correspondent banking area.
- Used both for customers' as well as for banks' processes.
- EPC assessment: Data elements 'End-to-End ID' and 'Transaction ID' used in SEPA continue to exist in the 2019 message version of ISO 20022. In the future UETR could potentially replace the aforementioned IDs.



Main differences in ISO 20022 messages used in SEPA (3/3)

Extension of element 'Structured' under 'Remittance Information' including e.g.:

- New sub-element 'Tax Remittance': provides remittance information about a payment made for tax-related purposes.
- New sub-element 'Garnishment Remittance': provides remittance information about a payment made for garnishment-related purposes.
- EPC assessment: Migrating to the 2019 message version of ISO 20022 could have an impact on the Extended Remittance Information (ERI) option if all or part of the new sub-elements are to be added to the IGs. This needs to be further assessed.

Modification of already existing sub-elements in element 'Structured' under 'Remittance Information' (e.g. Discount applied amount now contains type and amount)

- EPC assessment: Migrating to the 2019 message version of ISO 20022 will have a minor impact on ERI if all or part of the new sub-elements are to be added to the IGs.

Supplementary data (information that cannot be captured in the structured elements and/or any other specific block).

- EPC assessment: This is already available in the request for status update (pacs.028) message as well as the inquiry related messages (included in the current IGs) but it is currently not used in the SEPA schemes.

Externalisation of several code lists.

- EPC assessment: This simplifies the process for requesting new codes.



Main differences for pacs.002 only

New data element 'Original Group Information' under 'Transaction Information and Status' (Point to point reference, as assigned by the original instructing party, to unambiguously identify the original message).

- EPC assessment: : This could allow to have one pacs.002 (reject) message relating to several pacs.003 (interbank collection) or pacs.008 (interbank payment) messages.

New data element 'Effective interbank Settlement date' under 'Transaction Information and Status' (Date and time at which a transaction is completed and cleared, that is, payment is effected).

- EPC assessment: : Currently not relevant in the SEPA schemes as pacs.002 is only used as a reject (and as a positive/negative confirmation in the context of SCT Inst) in the IGs.

Charges information: data element 'Party' replaced by 'Agent'.

- EPC assessment: Currently not used in the SEPA schemes.



Main differences for pacs.003 only

New data elements (under 'Direct Debit Transaction Info'): 'Settlement Priority' (Indicator of the urgency or order of importance that the instructing party would like the instructed party to apply to the processing of the settlement instruction) and 'Settlement Time Indication' (Provides information on the occurred settlement time(s) of the payment transaction).

- EPC assessment: Currently not used in the SEPA schemes.

Charges information: data element 'Party' replaced by 'Agent'.

- EPC assessment: Currently not used in the SEPA schemes.

Extension of data element 'Remittance location details'.

- EPC assessment: Currently not used in the SEPA schemes.



Main differences for pacs.004 only

New sub-elements under 'Transaction Information' (i.e. info concerning the original transaction to which the return message refers): 'Original Interbank Settlement Date', 'Settlement Priority', 'Settlement Time Indication' and 'Original Clearing System Reference'. Moreover a new block 'Return Chain', which provides all parties involved in a return transaction, has also been added.

- EPC assessment: Currently not used in the SEPA schemes.

New sub-element 'Date Time' under 'Requested Execution Date' (to specify the execution time in addition to execution date).

- EPC assessment: No impact on the current return message.

Extension of data elements 'Original Frequency' and 'Frequency' (under 'Mandate Related Info')

- EPC assessment: Only applicable to SDD but currently not used in the SDD schemes.



Main differences for pacs.007 only

Data element 'Original Group Information' has been made optional

- EPC assessment: This element is used in the IGs and hence a usage rule will need to be added to indicate that this element is mandatory.

New sub-elements under 'Transaction Information': 'Original Group Information', 'Settlement Priority', 'Settlement Time Indication'

- EPC assessment: Could allow to have one pacs.007 (reversal) message relating to several pacs.003 (interbank collection) messages.

New sub-element 'Date Time' under 'Requested Execution Date' (To specify the execution time in addition to execution date).

- EPC assessment: No impact in the context of SDD.

Extension of data elements 'Original Frequency' and 'Frequency' (under 'Mandate Related Info') :

- EPC assessment: Only applicable to SDD but currently not used in the SDD schemes.



Main differences for pacs.008 only

Charges information: data element 'Party' replaced by 'Agent'.

- EPC assessment: Currently not used in the SEPA schemes because of "SLEV" (Following Service Level - Charges are to be applied following the rules agreed in the service level and/or scheme.)

Extension of data element 'Remittance location details'.

- EPC assessment: Currently not used in the SEPA schemes.

New data element 'Tax' under 'Credit Transfer Transaction Information': to provides details on tax (e.g. creditor and debtor side of the tax payment; amount; due date;).

- EPC assessment: Currently not used in the SEPA schemes

Main differences for pacs.028 only

No specific changes besides the ones listed in the general section (i.e. "Main differences in ISO 20022 messages used in SEPA"). Moreover, the EPC already uses the 2017 message version of the pacs.028.



Main differences for pain.001 only

New sub-element 'Date Time' under 'Requested Execution Date' (To specify the execution time in addition to execution date).

- EPC assessment: This could be useful in the context of SCT Inst.

New data element 'Instruction for Debtor Agent' under 'Payment Information' (Further information related to the processing of the payment instruction, that may need to be acted upon by the debtor agent, depending on agreement between debtor and the debtor agent).

- EPC assessment: Currently not used in the SEPA schemes as covered by data element 'Category Purpose'.

Extension of data element 'Remittance location details'.

- EPC assessment: Currently not used in the SEPA schemes.

Main differences for pain.002 only

Charges information: data element 'Party' replaced by 'Agent'.

- EPC assessment: Currently not used in the SEPA schemes.

New data element 'Tracker data' under 'Transaction Information and Status' (Provides information on the tracking of the interbank transaction related to the payment).

- EPC assessment: Currently not used in the SEPA schemes.



Main differences for pain.007 only

Element **'Batch Booking'** under **'Group Header'** has been removed in the 2019 version

- EPC assessment: Currently not used in the SEPA schemes.

New sub-elements **'Date'** & **'Date Time'** under **'Requested Execution Date'**.

- EPC assessment: Currently not used in the context of SDD.

Extension of data elements **'Original Frequency'** and **'Frequency'** (under **'Mandate Related Info'**)

- EPC assessment: Only applicable to SDD but currently not used in the SDD schemes.

Main differences for pain.008 only

Extension of data element **'Remittance location details'**.

- EPC assessment: Currently not used in the SEPA schemes.



Main differences for camt.029 only

Extension of data element 'Resolution Related Information' (e.g. under 'Transaction Information And Status': Sub-elements 'End-To-End Id', 'Transaction ID', 'Compensation' and 'Charges' have been included).

- EPC assessment: Not needed for SEPA schemes because information is already available in other elements. (Note: The 2018 ISO message version of camt.029 is already used for a positive and negative response to SCT inquiry messages)

Inclusion of data elements 'Modification Details' and 'Claim Non Receipt Details'

- EPC assessment: This inclusion was requested by the EPC to accommodate SCT inquiry messages.

'Original Next agent' (under Claim Non Receipt Details) is no longer mandatory in the 2019 version:

- EPC assessment: This element is used in the positive response (based on the 2018 message version of camt.029) to a Claim Non-receipt and hence a usage rule will need to be included to keep the element mandatory.

Extension of data elements 'Original Frequency' and 'Frequency' (under 'Mandate Related Info') :

- EPC assessment: Not applicable to SCT/SCT Inst as related to mandates.

Main differences for camt.056 only

Extension of data elements 'Original Frequency' and 'Frequency' (under 'Mandate Related Info') :

- EPC assessment: Not applicable to SCT/SCT Inst as related to mandates.

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for proposing a change request in a SEPA Payment Scheme

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by 31 December 2019

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Your reference:	#24 -sdd core-dutch payments association-new r-transaction reason codes
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0
Request Date:	December 10th 2019
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules

1 General Description of the Change Request

1.1 Suggested launch date (if any):

Publication: November 2020

Operational: November 2021

1.2 Description of the change request:

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 about the exact blocking option as set by the Debtor which causes the R-transaction.

Currently the Creditor may receive the code SL01 ("Due to specific service offered by the Debtor Agent") if the R-transaction is caused by one of the four reasons as mentioned above.

However, by receiving this code the Creditor cannot determine the precise issue.

If the Creditor can receive a more specific reason code, it can communicate swiftly and more precise with the Debtor what is causing the collection failure at the Debtor's end. Therefore, this change request proposes, in addition to SL01, the following four specific reason codes:

Code	Name	Definition
SL11	Creditor not on Whitelist of Debtor	Whitelisting service offered by the Debtor Agent; Debtor has not included the Creditor on its "Whitelist" (yet). In the Whitelist the Debtor may list all allowed Creditors to debit Debtor bank account."
SL12	Creditor on Blacklist of Debtor	Blacklisting service offered by the Debtor Agent; Debtor included the Creditor on his "Blacklist". In the Blacklist the Debtor may list all Creditors not allowed to debit Debtor bank account.
SL13	Maximum number of Direct Debit Transactions exceeded	Due to Maximum allowed Direct Debit Transactions per period service offered by the Debtor Agent.
SL14	Maximum Direct Debit Transaction Amount exceeded	Due to Maximum allowed Direct Debit Transaction amount service offered by the Debtor Agent.

Note: the Dutch Payments Association took care of the application process for above mentioned reason codes at ISO.org. The codes were already approved during the ISO 20022 Payments SEG meeting of March 2016.



Additional practical arguments

1. Introducing specific codes for these four (optional) settings will help all parties involved to inform each other in a more accurate way. It also helps Creditors to act/communicate in line with (one of) the four possible blocking options as used by the Debtor(s).

2. SEUF members, who are interested in these codes, reported day-to-day situations which lead to collection issues for Creditors and possible disruptions in the provision of goods and services to Debtors (despite the existence of a valid SDD mandate).

E.g. Debtors:

- do not amend, after price-increasement, the amount limitation as set in the past;
- do not adjust frequency limitations if they use several (new) services from the Creditor;
- may forget to add a new Creditor on their white list.

3. During the last 1,5 years it is stated in different EPC-documents that the market demand across Europe for these reason codes has grown significantly (e.g. SEUF 004-18 7th SEUF meeting 23 August 2018, SEM027-19)

1.3 Wherever possible, please indicate:

1. Impact on the Scheme in general:

Schemes will become more customer-friendly for end-users

2. Impact on the interbank space:

Number of (possible) reason codes to be used by Debtor Banks will be extended

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

Yes, the list of reason codes will be extended with four new reason codes

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

NO

5. The nature of the change request:

A variant (adding an alternative – optional – rule alongside an existing Rulebook element)

By adding new reason codes the Debtor Banks can supply Creditor Banks with more specific information in case whitelisting and/or specific debtor driven services provided by Debtor Banks (as described in the SEPA Regulation) are in use. Creditor Banks can pass this information towards their Creditors. Creditors can act/communicate in line with this knowledge towards their Debtors.



2 Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	YES
Is the change request underpinned by a cost-benefit analysis?	NO
Does the change fit into the strategic objectives for SEPA?	YES
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES
Do you consider that the change request does not impede SEPA-wide interoperability?	YES
Do you consider that the change request is in the scope of the scheme involved?	YES

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for proposing a change request in a SEPA Payment Scheme

change-request.EPC-scheme@epc-cep.eu by 31 December 2019

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Your reference:	EPC_CR01_2020
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC125-05 2019 SEPA Credit Transfer Rulebook Version 1.0 EPC004-16 2019 SEPA Instant Credit Transfer Rulebook Version 1.0 EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	
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1 General Description of the Change Request

1.1 Suggested launch date (if any):

Earliest possible release.

1.2 Description of the change request:

We ask for the scheme rulebooks to be amended to include provision for the application of Article 6 (2) and Article 8 (1) of Regulation 2015/847/EU.

Regulation 2015/847/EU (Funds Transfer Regulation) provides for the use of derogations by PSPs when processing SEPA DD's and CT's. Specifically the derogations under Article 6 (2), linked transactions up to €1000 and article 8 (1) the use of effective risk based procedures.

Whilst we appreciate that Article 8 (1), may not constitute a derogation per se, but rather a natural obligation of a PSP, it is our understanding that the rulebooks do not provide for a situation whereby a PSP may wish to invoke an approach that allows for the application of a risk based approach when processing transactions that are not considered 'at risk' and remain aligned to the overall AML and CTR obligations to ensure the traceability of payment transactions.

The background to this CR is the recent discussions that the Irish Industry has undertaken with our National Regulator during Brexit preparations.

1.3 Wherever possible, please indicate:

1. Impact on the Scheme in general:

Provides direct alignment between the Rulebooks and Regulation

2. Impact on the interbank space:

N/A

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

N/A

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

N/A

5. The nature of the change request:

A variant (adding an alternative – optional – rule alongside an existing Rulebook element)



2 Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	Yes
Is the change request underpinned by a cost-benefit analysis?	No
Does the change fit into the strategic objectives for SEPA?	N/A
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	Yes
Do you consider that the change request does not impede SEPA-wide interoperability?	Yes
Do you consider that the change request is in the scope of the scheme involved?	Yes

Template for Proposing a Change Request in a SEPA Payment Scheme



European
Payments Council

EPC 045-18
Version 1.0
19 June 2019

Public

Approved

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by 31 December 2019**

Name of contributor:	Legal Support Group (LSG)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	
Scheme and document and version number:	Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to: EPC125-05 2019 SEPA Credit Transfer Rulebook Version 1.0 EPC004-16 2019 SEPA Instant Credit Transfer Rulebook Version 1.0 EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	23 December 2019
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules



1. General Description of the Change Request

1.1. Suggested launch date (if any):

November 2021

1.2. Description of the change request:

The suggestion is to replace the term “Bank” with the term “PSP” in all the EPC SEPA payment scheme rulebooks to formally reflect the changes introduced by PSD to the categories of institutions that can offer payment services, and the variety in PSP categories that are eligible to adhere to the EPC SEPA payment schemes.

This change request leads to the following changes:

- A. Specific term change in the rulebooks, related Implementation Guidelines and the various rulebook annexes (scheme options, risk management, internal rules):
 - SCT and SCT Inst schemes: “Originator Bank” and “Beneficiary Bank” changed into “Originator PSP” and “Beneficiary PSP”
 - SDD Core and B2B schemes: “Debtor Bank” and “Creditor Bank” changed into “Debtor PSP” and “Creditor PSP”
 - Terms of ‘interbank’ and ‘inter-bank’ (e.g., in ‘interbank space’) changed into ‘inter-PSP’
 - Term of ‘Customer-to-Bank’ and ‘Bank-to-Customer’ changed into ‘Customer-to-PSP’ and ‘PSP-to-Customer’
- B. Inclusion of the definition “PSP” in Chapter 7 being

PSP	<i>Any ‘Payment Service Provider’ as defined in PSD2 that is eligible to participate in the scheme in accordance with Rulebook section 5.4</i>
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- C. Removal of the last paragraph in section 5.4 making a reference to the rulebook term “bank” or “banks”
- D. Change to the term “Customer” in Chapter 7

Customer	<i>A physical or legal entity that is not active in the business of providing payment accounts used for the execution of payments and that is therefore not eligible for scheme participation</i> For SCT and SCT Inst: Such entity can take up the role of Originator and/or Beneficiary under the Scheme
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	For SDD Core and B2B: Such entity can take up the role of Debtor or Creditor under the Scheme
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1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

Impact limits itself to terminology changes and any definition amendments. No business or adherence rules are affected.

2. Impact on the interbank space: /

None apart of the terminology change.

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

None.

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

Yes, removal of a dedicated sentence in Section 5.4

5. The nature of the change request:

- a. A change (deleting or replacing an existing Rulebook element by a new one)

2. Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.



Is the change request a case for SEPA wide acceptance?	Yes. PSP is now a widespread term and covers a wider range of players under PSD2.
Is the change request underpinned by a cost-benefit analysis?	Not necessary as it does not affect any business, technical or adherence rules.
Does the change fit into the strategic objectives for SEPA?	Yes. The use of a uniform term and definition of an institution that offers (among others) SEPA payment scheme services.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	Yes.
Do you consider that the change request does not impede SEPA-wide interoperability?	Yes.
Do you consider that the change request is in the scope of the scheme involved?	Yes.

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Distribution: Publicly available

for proposing a change request in a SEPA Payment Scheme
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by December 31th 2019

Name of contributor:	Klok, Jeannette (on behalf of GSMA)
Organisation:	GSMA (Global Association of Mobile Operators)
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Your reference:	CR01-R-Code
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	28-12-2019
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules

1 General Description of the Change Request

As mentioned in the minutes of the 9th SEUF meeting (September 12th 2019) the EPC Director General invited the SEUF members concerned, to work out a detailed change request for the 2020 rulebook change management cycle if they wish to pursue their request on optimisation of the Scheme R codes. This Change Request applies to this invitation.

1.1 Suggested launch date (if any):

November 2021

1.2 Description of the change request:

More specific codes additional to reason code SL01 "Specific Service Offered By Debtor Agent"

Currently the Creditor only receives the code SL01, but cannot determine the precise issue. Meanwhile the Collection processes of the Creditor will continue, based on a valid SDD mandate. If the Creditor receives a more precise reason code, it can swiftly communicate to the Debtor in order to explain what reason is causing the collection failure at the Debtor's end. This will prevent the Debtor from being sent "pillar to post" in order to resolve the issue as quickly as possible.

The below proposed codes, to be used by Debtor Banks, identify the following four reasons (note: these codes are specifically for the SDD Core rulebook, SL14 only for the SDD B2B rulebook):

Code	Name	Definition
SL11	Creditor not on Whitelist of Debtor	Whitelisting service offered by the Debtor Agent; Debtor has not included the Creditor on its "Whitelist" (yet). In the Whitelist the Debtor may list all allowed Creditors to debit Debtor bank account. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.
SL12	Creditor on Blacklist of Debtor	Blacklisting service offered by the Debtor Agent; Debtor included the Creditor on his "Blacklist". In the Blacklist the Debtor may list all Creditors not allowed to debit Debtor bank account. Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.
SL13	Maximum number of Direct Debit Transactions exceeded	Due to Maximum allowed Direct Debit Transactions per period service offered by the Debtor Agent.

Code	Name	Definition
		Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.
SL14	Maximum Direct Debit Transaction Amount exceeded	<p>Due to Maximum allowed Direct Debit Transaction amount service offered by the Debtor Agent.</p> <p>Note: It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SL01 can still be used.</p>

Additional explanation and use cases:

The SEUF members interested in these codes reported the day-to-day situations below. They lead to collection issues for Creditors and possible disruptions in the provision of goods and services to Debtors (despite the existence of a valid SDD mandate) if the Creditor fails to reach the Debtor in a reasonable amount of time to understand the exact cause of the payment failure:

- The Debtor defines a white list of Creditors: in case the Debtor chooses to change Creditors for the delivery of an existing good or service, or signs an SDD mandate with a new Creditor for a total new delivery of goods or services, the Debtor may forget to add this new Creditor on this white list.
- This issue also applies when there is a merger or take-over between Creditors. The new Creditor communicates this change to the Debtor but the Debtor does not modify its Creditor white list. Consequently, the new Creditor Identifier and/or name mentioned in the collection lead to a collection failure.
- The Debtor has set collection amount limitations: if foreseen by contractual arrangements or communicated well in advance, or an increased total fee due to additional services which is collected via a combined single SDD transaction, Creditors increase the amounts they collect over the years. If the Debtor does not amend its amount limitation set in the past, the collection will fail as the collection amount exceeds the amount limitation.
- The Debtor has set collection frequency limitations: the Creditor represents the collection as the initial collection was rejected due to a different reason (e.g., insufficient funds). Both the initial failed collection and the second collection attempt are counted and assessed against the collection frequency limitations set by the Debtor at the Debtor Bank. If this second collection attempt exceeds the frequency limitation, the second attempt will be rejected as well (even if the reasons for rejection no longer apply (e.g. insufficient funds). The number of collection attempts accelerates if the Debtor uses several services from the Creditor and the latter collects the due fees via separate SDD transactions.



1.3 Wherever possible, please indicate:

1. Impact on the Scheme in general:

The impact on the scheme in general is considered as “small”.

2. Impact on the interbank space:

There will be impact on the interbank space, however it is proposed to minimise this effort, based upon implementation opportunity within national law.

3. Impact on the message standards (SEPA Scheme Implementation Guidelines and other standards):

The impact on message standards is none.

4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

None

5. The nature of the change request:

- a. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)



2 Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	Yes
Is the change request underpinned by a cost-benefit analysis?	No
Does the change fit into the strategic objectives for SEPA?	Yes
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	Yes
Do you consider that the change request does not impede SEPA-wide interoperability?	Yes
Do you consider that the change request is in the scope of the scheme involved?	Yes

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Distribution: Publicly available

for proposing a change request in a SEPA Payment Scheme

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by 31 December 2019

Name of contributor:	Dekker, Michel
Organisation:	Verenigde Groot Incassanten (VGI) (Association of large SDD users) The association represents about 45% of all Dutch SDD transactions. It includes the following organisations: Achmea, Eneco, Essent, KPN, Nationale Nederlanden, Nuts Group, PostNL, Sligro, Goede Doelen Loterijen, VGZ, VodafoneZiggo.
Contact details:	Michel Dekker (operational chair) blikvelden@gmail.com +31644347897
Your reference:	CR2019-01-VGI
Scheme and document and version number:	<u>Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:</u> EPC016-06 2019 SEPA Direct Debit Core Rulebook Version 1.0 EPC222-07 2019 SEPA Direct Debit Business to Business Rulebook Version 1.0
Request Date:	30-12-2019
For information:	This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' (SMIRs) available on the EPC Website: https://www.europeanpaymentscouncil.eu/document-library/other/sepa-scheme-management-internal-rules



1 General Description of the Change Request

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November 2021

1.2 Description of the change request:

More specific codes instead of reason code SL01 "Specific Service Offered By Debtor Agent"

Currently the Creditor only receives the code SL01, but cannot determine the precise issue. Meanwhile the Collection processes of the Creditor will continue, based on a valid SDD mandate. If the Creditor receives a more precise reason code, it can swiftly communicate to the Debtor in order to explain what reason is causing the collection failure at the Debtor's end. This will prevent the Debtor from being sent "pillar to post" in order to resolve the issue as quickly as possible.

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Additional explanation and use cases:

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4. Impact on the legal rules as defined in chapter 5 of the EPC SEPA Scheme Rulebooks:

None

5. The nature of the change request:

- a. A variant (adding an alternative – optional – rule alongside an existing Rulebook element)



2 Elements of evaluation

The submitting party is requested to give an appropriate answer to each of these questions with sufficient detail to allow the EPC to make an evaluation of the change request submitted.

Is the change request a case for SEPA wide acceptance?	Yes
Is the change request underpinned by a cost-benefit analysis?	No
Does the change fit into the strategic objectives for SEPA?	Yes
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	Yes
Do you consider that the change request does not impede SEPA-wide interoperability?	Yes
Do you consider that the change request is in the scope of the scheme involved?	Yes