



SEPA Direct Debit Core Rulebook

Change Proposal Submission Document Following the 2020 Public Consultation on SDD Core Change Requests

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Public



Change Proposal Submission Document on 2020 SDD Core Change Requests



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1 Foreword: the Principles of SEPA Payment Scheme Development

1) Introduction

This document contains the results and comments received on the change requests submitted for public consultation on possible modifications to be introduced into the SDD Core rulebook. It provides feedback to all stakeholders on the results of the 2020 public consultation.

The Single Euro Payments Area (SEPA) payment schemes, as set out in the SEPA Credit Transfer (SCT) and SEPA Direct Debit (SDD) rulebooks, evolve based on a transparent change management process adhered to by the European Payments Council (EPC).

This evolution reflects changes in market needs and updates of technical standards developed by international standardisation bodies, such as the International Organization for Standardization (ISO).

The principles governing the evolution of the SEPA payment schemes are set out in section four of the [SEPA Payment Scheme Management Rules](#).

2) EPC SEPA payment scheme rulebook release management - important notice to all SEPA stakeholders

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

The 2021 versions of the SCT and SDD rulebooks will be published on 26 November 2020 and the 2023 versions exceptionally in May 2022. Based on the established release management cycle, these versions will take effect on 21 November 2021 and 19 November 2023 respectively.

3) SEPA payment scheme development: EPC scheme change management

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

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

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

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

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

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



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

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

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



2 Executive Summary

This Change Proposal Submission Document (EPC118-20) describes that each stage of the 2020 SDD Core rulebook change management cycle, from the initiation to the public consultation, has been properly completed in respect of each change request submitted.

The first step in the change management cycle has been the **introduction of change requests** to the SDD Core scheme by any interested party. The deadline for receipt of such suggestions was 31 December 2019. The EPC received **16** change requests for major changes to be introduced into the SDD Core rulebook.

The **public consultation** on possible modifications to be introduced into the SDD Core rulebook, was held between 12 March and 09 June 2020. The EPC received input from 24 (communities of) PSPs and other stakeholders. Please refer to the Annex I for the full list of contributors.

The documents circulated for the public consultation were the document SDD Core rulebook 2020 Change Request Public Consultation Document (EPC003-20) and the Response Template (EPC007-20). Both documents have been made available on the [EPC Website](#).

This Change Proposal Submission Document contains for each change request:

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

The SMB took into account the position documents **EPC 149-20** and **EPC 150-20** from the SEUF and the ESTF respectively when making its decision on each change request and the related SEMWG change proposal.

As a result of the 2020 SDD Core rulebook change management process, the **2021** SDD Core rulebook has been updated to include

- The replacement of EONIA rate references into references to the euro short-term rate (€STR);
- The removal of the current rulebook references to the e-Mandate operating model;
- The replacement of the term 'Bank' with 'PSP' and an updated definition of the term 'Customer'.

The SMB decided to include the following 2020 change requests in the **2023** SDD Core rulebook instead of the proposed implementation date in November 2022:

- The migration of all ISO 20022 XML-based messages under the SDD Core rulebook to the 2019 version of the ISO 20022 messaging standard;
- The alignment of all attribute numbers across all four EPC SEPA payment scheme rulebooks.

The **2023** SDD Core rulebook and related implementation guidelines (IGs) will also include possible business and/or functional rule changes that the SMB may approve at the end of the 2022 SEPA payment scheme rulebook change management cycle.



The implementation of a major version change of the used ISO 20022 messages in combination with the implementation of possible new/amended business and/or functional rules in a single rulebook release, may form a challenge for some SDD Core scheme participants. To ease this potential challenge, the EPC will publish the 2023 SDD Core rulebook and related IGs in May 2022 instead of November 2022. This gives the SDD Core scheme participants 18 months instead of the standard 12 months to do these changes.

Overview of the 2020 SDD Core change requests and the final SMB decision

Item	Change request title	SMB decision
1	Development of an SDD fixed amount option or scheme	Not to be included in the 2021 SDD Core rulebook version 1.0.
3	Protection improvements for Debtors	Not to be included in the 2021 SDD Core rulebook version 1.0.
6	Update calculation method of compensation currently based on EONIA	For inclusion in the 2021 SDD Core rulebook version 1.0.
7	Replacement of references to EONIA into €STR	For inclusion in the 2021 SDD Core rulebook version 1.0.
8	Change request has been withdrawn	Not applicable.
13	Removal of references to the e-Mandate operating model	For inclusion in the 2021 SDD Core rulebook version 1.0.
16	Alignment of all attribute numbers across all EPC SEPA payment scheme rulebooks	For inclusion in the 2023 SDD Core rulebook version 1.0.
17	Changes to EPC208-08 'EPC e-Operating Model detailed specifications'	Not to be included in the 2021 SDD Core rulebook version 1.0.
20	Migration to the 2019 version of the ISO 20022 messaging standard	For inclusion in the 2023 SDD Core rulebook version 1.0.
24	New r-transaction reason codes	Not to be included in the 2021 SDD Core rulebook version 1.0.
35	Align the rulebook with the Funds Transfer Regulation	Not to be included in the 2021 SDD Core rulebook version 1.0.
43	Replacement of the term Bank with PSP and updated Customer definition	For inclusion in the 2021 SDD Core rulebook version 1.0.
45	New r-transaction reason codes	Not to be included in the 2021 SDD Core rulebook version 1.0.
46	Change request has been withdrawn	Withdrawn
47	Change request has been withdrawn	Withdrawn
48	New r-transaction reason codes	Not to be included in the 2021 SDD Core rulebook version 1.0.



3 Overview of Change Requests Submitted for the 2020 Public Consultation

All change requests to the SDD Core rulebook were reviewed by the SEMWG.

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

1) Possible recommendations for a change request

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

- a) The change request is **already provided for** in the scheme: no action is necessary for the EPC.
- b) The change request **should be incorporated into the scheme**: the change request 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 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



2) Summary of change requests and the expressed support following the public consultation

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

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

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

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

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

Item	Change request title	Topic	EPC SEMWG recommendation	Count "Yes"	Count "No"	Count "No Opinion"
1	Development of an SDD fixed amount option or scheme	New SDD scheme	Cannot be part of the existing scheme (option e)	17	1	2
3	Protection improvements for Debtors	Debtor protection	Cannot be part of the existing scheme (option e)	17	1	2
6	Update calculation method of compensation currently based on EONIA	Compensation calculation	Inclusion into the scheme (option b) as of Nov 2021	17	0	3
7	Replacement of references to EONIA into €STR	Compensation calculation	Inclusion into the scheme (option b) as of Nov 2021	17	0	3
8	Change request has been withdrawn	Withdrawn	Withdrawn			
13	Removal of references to the e-Mandate operating model	Annex VII e-Mandates	Inclusion into the scheme (option b) as of Nov 2021	18	0	2
16	Alignment of all attribute numbers across all EPC SEPA payment scheme rulebooks	Attribute numbering	Inclusion into the scheme (option b) as of Nov 2022	15	2	3
17	Changes to EPC208-08 'EPC e-Operating Model detailed specifications'	Annex VII e-Mandates	Cannot be part of the existing scheme (option e)	17	1	2
20	Migration to the 2019 version of the ISO 20022 messaging standard	ISO 20022 version	Inclusion into the scheme (option b) as of Nov 2022	13	6	1
24	New r-transaction reason codes	R-transaction	No SEMWG recommendation defined	6	11	3
35	Align the rulebook with the Funds Transfer Regulation	Regulatory compliance	Cannot be part of the existing scheme (option e)	17	0	3
43	Replacement of the term Bank with PSP and updated Customer definition	Terminology	Inclusion into the scheme (option b) as of Nov 2021	16	1	3
45	New r-transaction reason codes	R-transaction	No SEMWG recommendation defined	6	11	3
46	Change request has been withdrawn	Withdrawn	Withdrawn			
47	Change request has been withdrawn	Withdrawn	Withdrawn			
48	New r-transaction reason codes	R-transaction	No SEMWG recommendation defined	6	11	3

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

Item	Change request title	Topic	EPC SEMWG recommendation	Count "Yes"	Count "No"	Count "No Opinion"
1	Development of an SDD fixed amount option or scheme	New SDD scheme	Cannot be part of the existing scheme (option e)	2	1	1
3	Protection improvements for Debtors	Debtor protection	Cannot be part of the existing scheme (option e)	2	0	2
6	Update calculation method of compensation currently based on EONIA	Compensation calculation	Inclusion into the scheme (option b) as of Nov 2021	2	0	2
7	Replacement of references to EONIA into €STR	Compensation calculation	Inclusion into the scheme (option b) as of Nov 2021	2	0	2
8	Change request has been withdrawn	Withdrawn	Withdrawn			
13	Removal of references to the e-Mandate operating model	Annex VII e-Mandates	Inclusion into the scheme (option b) as of Nov 2021	2	0	2
16	Alignment of all attribute numbers across all EPC SEPA payment scheme rulebooks	Attribute numbering	Inclusion into the scheme (option b) as of Nov 2022	2	0	2
17	Changes to EPC208-08 'EPC e-Operating Model detailed specifications'	Annex VII e-Mandates	Cannot be part of the existing scheme (option e)	2	0	2
20	Migration to the 2019 version of the ISO 20022 messaging standard	ISO 20022 version	Inclusion into the scheme (option b) as of Nov 2022	2	1	1
24	New r-transaction reason codes	R-transaction	No SEMWG recommendation defined	2	1	1
35	Align the rulebook with the Funds Transfer Regulation	Regulatory compliance	Cannot be part of the existing scheme (option e)	2	0	2
43	Replacement of the term Bank with PSP and updated Customer definition	Terminology	Inclusion into the scheme (option b) as of Nov 2021	2	0	2
45	New r-transaction reason codes	R-transaction	No SEMWG recommendation defined	2	1	1
46	Change request has been withdrawn	Withdrawn	Withdrawn			
47	Change request has been withdrawn	Withdrawn	Withdrawn			
48	New r-transaction reason codes	R-transaction	No SEMWG recommendation defined	2	1	1



3) Summary of changes for inclusion in the next version of the SDD Core rulebook to be aligned with the SEPA Regulation or with any other relevant EU legislation

One change item was identified at the time of the start of the public consultation that required a change to the rulebook due to a particular EU legislation. It concerned a re-arrangement of the list of non-EEA SEPA authorisation references in the four EPC SEPA payment scheme rulebooks.

This change had been qualified as “Change for Regulatory Reasons” within the meaning of Section 4.2.9 of the SEPA Payment Scheme Management Rules, due to legal amendments that “necessitate the urgent alignment of the Schemes with such rules and regulations”.

The contributors to this public consultation were invited to comment on this change.

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> <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>



Change	Reason for change
	<p>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;</p> <p>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;</p> <p>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</p> <p>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.”</p> <p>[+ 8) Andorra and 9) Vatican City State]</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> <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



Change	Reason for change
	<p>the Rulebooks or wait for each Change Management Cycle to be able to reflect such changes.</p> <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 Major Change Request Details, the Related Public Consultation Comments and the SEMWG Change Proposal

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

i. 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.

ii. 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.



iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Satsipay Europe	No. Request to pay is a great solution also for a possible SDD substitution but has the drawback to not be automatic. There should be an “implicit accept” option within the RTP standard that the debtor can check on a specific creditor identifier, and for this case, also on a specific amount.
SIX on behalf of Swiss Banking Community	Yes. For recurring fixed amounts there are better alternatives EBPP/SCT Inst/SCT.
Spanish Association of CFOs (ASSET)	No. We support this change request. Request-to-pay is yet to be implemented by banks (if they do), whilst SDD CORE is working smoothly, so this option could be easily deployed and adopted. It would decrease the risk of refunds in a noteworthy volume of SDDs without jeopardising the PSUs rights.

iv. SMB decision

Not to be included in the 2021 SDD Core rulebook.



2) # 3: Protection improvements for Debtors

i. 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.

ii. 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;

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.



- Maximum number of Direct Debit transactions within a certain period is exceeded by the Creditor;
- SDD transaction exceeds a maximum amount.

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
SIX on behalf of Swiss Banking Community	Yes. The right of unconditional objection is sufficient protection.

iv. SMB decision

Not to be included in the 2021 SDD Core rulebook.



3) # 6: Update calculation method of compensation currently based on EONIA

i. 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.

ii. 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 4) which covers the same topic in more detail.

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

No comments were submitted.

iv. SMB decision

For inclusion in the 2021 SDD Core rulebook.



4) # 7: Replacement of references to EONIA into €STR

i. 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.

ii. 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 3) covers the same topic.

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

No comments were submitted.

iv. SMB decision

For inclusion in the 2021 SDD Core rulebook.



5) # 8: Change request has been withdrawn

i. Description

This change request has been withdrawn.



6) # 13: Removal of references to the e-Mandate operating model

i. 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.

ii. SEMWG analysis and recommendation

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

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

No comments were submitted.

iv. SMB decision

For inclusion in the 2021 SDD Core rulebook.



7) # 16: Alignment of all attribute numbers across all rulebooks

i. 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**.

ii. 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.

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The large majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

The SEMWG proposal is that the entry-into-force date of the change request item #16 is identical to the one for change request item #20 (migration to the 2019 version of the ISO 20022 standard).

Although both change requests are not functional changes to the scheme, they represent a huge workload for scheme participants and other stakeholders in their applications, systems and technical documentation. To allow the concerned market players to optimize the resources needed to do these changes, both change requests should be implemented at the same time.

If the SMB does not support the entry-into-force date of November 2022 for the item #20, then the item #16 should not become effective in November 2022 either.

**Explicit public consultation comments received**

Contributor	Comments received
French Banking Federation	Yes. We support the recommendation on the condition that its inclusion in the scheme is aligned with the deadline decided for CR # 20.
German Banking Industry Committee (GBIC)	No. We propose to postpone the proposed alignment to November 2023 (together with CR #20).
STUZZA GmbH on behalf of Austrian Banking Community	No. In principle the Austrian community supports that change request but it should not be done until 2023 (see also item 20).

iv. SMB decision

For inclusion in the **2023** SDD Core rulebook.



8) # 17: Changes to EPC208-08 'EPC e-Operating Model detailed specifications'

i. 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.

ii. 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 6) of this document proposing the removal of all references to this model from both SDD rulebooks.

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

No comments were submitted.

iv. SMB decision

Not to be included in the 2021 SDD Core rulebook.



9) # 20: Migration to the 2019 version of the ISO 20022 messaging standard

i. 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.



ii. 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.

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

A majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

However, some stakeholders and PSP communities opposing to it suggest the implementation in November 2023 or 2024. One major justification of their position is the decision of SWIFT to postpone the kick-off of the migration of its FIN messages to the ISO 20022 message standard, from November 2021 to November 2022. The second justification to ask for a delay of this ISO version migration, was a pending Eurosystem decision⁵ to retain the current November 2021 migration date for Target2 or to postpone it to a later date. These contributors highlight that these other migration projects have a considerable impact on their resource planning.

The SEMWG supports the need for the four EPC SEPA payment schemes to migrate to the 2019 version of the ISO 20022 standard. But with the decisions taken by SWIFT and the Eurosystem during and after the public consultation and the comments received during the public consultation, the SEMWG considers it is not in a position to make a wide-supported proposal to migrate to the 2019 version of the ISO 20022 standard in November 2022. Nor can it propose an ISO version migration date in 2023 or later as such later date has not been presented first in a three-months public consultation.

In light of these external developments, the SEMWG invites the SMB to decide by when the EPC payment scheme rulebooks should migrate at best to a newer ISO 20022 version.

Explicit public consultation comments received

Contributor	Comments received
Banking and Payments Federation Ireland	No. Whilst members understand the rationale for upgrading to ISO20022 2019 for the EPC Schemes, BPFI would look to move this date out to 2023. Currently members are involved in a number of ISO migration projects including TARGET2 and SWIFT. The impact of COVID 19 on these and other planned projects along with the delay of the SWIFT migration has impacted resource planning for 2020/21/22. The current version of ISO provides for customer requirements and the cost of the upgrade and the resources required may not reflect an improved service for customers at this time. Therefore, members would seek to schedule this change for 2023 to ensure there are adequate resources to complete the migration.

⁵ After the closure of the public consultation on the 2020 SEPA payment rulebook change requests, the Eurosystem decided to postpone the Target2 migration to 2022.



Contributor	Comments received
Dutch Payments Association	<p>No opinion. Among our members there is no majority to support or reject this proposed change request. Our members do have different point-of-views on this. Especially there are concerns about the added value for the (corporate) end-customer and the proposed timelines for the operational Implementation Guidelines.</p> <p>On the other hand, using the same standard for both SEPA and non-SEPA transactions is very important to some of them. Especially from an efficiency and transparency point-of-view. This might be in the interest of banks and end-users alike.</p> <p>Furthermore, our members would like to urge the EPC to develop a policy on how to align the Rulebooks and Implementation Guidelines with the ongoing developments of the ISO20022 standard. They also propose EPC to consider ECB's decision/recommendation on the (final) implementation moment of the new version.</p>
Febelfin Belgium	<p>No. We are not in favour of the migration. We do not see the need for this migration. Nor from the clients, nor from the banks. And investment for change will be huge.</p>
Fiserv	<p>No. With the introduction of Request to Pay there is significant discrepancy between the data than can be held in an SCT request and that in a Request for Payment. This will result in different and incompatible ways of handling this data across providers and PSPs thus negating the benefits of a cross Euro scheme. The current implementation guidelines also provide support for different versions of the individual messages, bring these back into alignment is a critical requirement as we move forward</p>
French Banking Federation	<p>No. French banking community agrees with the principle of a migration of the current 2009 ISO 20022 towards the 2019 version. Anyhow FBF wishes to postpone this migration as of november 2024 due to the current discussion regarding the Target 2 migration (initially planned on November 2021) and the postponement of the Swift migration as of november 2022. Furthermore, 2024 being a "sepa blank year" (i.e. without functional evolutions to implement), it will allow PSPs to focus exclusively on this technical migration.</p>
German Banking Industry Committee (GBIC)	<p>No. We propose to postpone the proposed migration to November 2023 (together with CR #16).</p>
Italian Banking Association	<p>No. Although the migration of the four SEPA Rulebooks to the 2019 version of ISO20022 is beneficial, the timeline should be properly reconsidered, taking into account the decision of SWIFT to postpone the migration in the "correspondent banking" context to November 2022 and the debate about the</p>



Contributor	Comments received
	postponement of the T2/T2S Consolidation deadline to November 2022 as well. Considering these ongoing projects, we suggest that we defer this CR to the next change management cycle.
Slovak Banking Association	Yes. The current situation related to the coronavirus is very challenging. Banks focus mainly on maintaining their core activities. Change activities are reduced where possible. Therefore, we fully support the SEM WG's recommendation to include this change into the scheme as of Nov 2022.
STUZZA GmbH on behalf of Austrian Banking Community	No. In principle the Austrian community supports that change request but it should not be done until 2023 (see also item 16).

iv. SMB decision

For inclusion in the 2023 SDD Core rulebook.



10) # 24: New r-transaction reason codes

i. 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

ii. 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.



iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) indicated that this change request cannot be part of the scheme.

Based on the number of the respondents not supporting this change request, the SEMWG proposes not to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Association des Banques et Banquiers Luxembourg (ABBL)	The change request cannot be part of the existing scheme. There are no demands from the creditors.
Bank Association of Slovenia	We do not need the new r-transaction reason codes SL11, SL12, SL13 and SL14. Reason code SL01 is sufficient.
Banking and Payments Federation Ireland	Agree with the inclusion of new R Codes - provided the definition of the reason codes is very specific to ensure that they can be applied in a consistent way by all banks.
Bits / Finance Norway	Supported. The codes will add quality to the Scheme and to the users.
Dutch Payments Association	In some communities, e.g. the Netherlands, many creditors, especially when processing a (very) large number of SDD transactions, have a strong need, to automate their (internal) processes in a fully Straight-Through- Processing (STP) way. Whenever a SDD transaction gets rejected or returned, they determine automatically, based on the reason code received, what their follow-up action will be and, preferably, they also automate that follow-up action by, e.g., generating and sending an e-mail to the debtor. In that e-mail they want to be specific, e.g. asking the debtor to update his/her whitelist. However, whenever the reason code received is rather generic, it is not possible to either automate the follow-up action or to be specific in that follow-up action and, thus, manual action will be required, which involves additional costs. So, more specific reason codes are required to help these creditors and by making the use of these reason codes optional, there will be no obligation for communities where there is no need for these reason codes.
Electronic Money Association	No opinion.
equensWorldline	We agree with the change proposal and support the inclusion in the Rulebook
European Association for the Co-ordination of Consumer Representation in Standardisation (ANEC)	While the generic reason code SL01 (Specific Service Offered By the Debtor Agent) covers a range of possible reasons, consumer is often left clueless why the collection failure occurred. This is because the lack of a unique r-transaction reason code for each reason permitted by the SEPA End-Date



Contributor	Comments received
	<p>Regulation prevents the Creditor to develop highly automated follow-up processes for these failed collections internally and with the Debtor. Therefore, we agree that the inclusion of more specific reason codes would foster a symmetry of information sharing between the SDD scheme participants and their respective customers, as mentioned in the introductory reasoning on the change requested.</p> <p>However, the proportional measures should be taken into account, as some of the consumer representatives fear the requested introduction of unique reason codes may damage consumer interests in relation to sensitive matters. As a compromise, ANEC suggests to start with the introduction of the two proposed codes first: namely, ""SL13 - Maximum number of Direct Debit Transactions exceeded"" and ""SL14 Maximum Direct Debit Transaction Amount exceeded"".</p> <p>In the next scheme change management cycle, new evidence across SEPA countries may be collected to see the effect of the introduction of SL13 and SL14 codes. If needed, a further action to go forward with the SL11 and SL12 could be tabled for review (cycle 2022 or later). We would welcome if more statistical data of the change effect would be made available by that time, to be able to reassess and judge what is the real breakdown by reason and by country 'behind' the remaining SLO1 (examining reason code usage data before and after the proposed change).</p> <p>It is also important to ensure, that the application of the change follows the path described in 'Notes' to the CR #45 and #48 tables: 'It could be possible that in certain SEPA countries national law prohibits the use for reasons of data protection. SLO1 can still be used.' We fully agree with this provision of exceptionality.</p>
Febelfin Belgium	<p>We don't see a need for new reason codes. Local legal restriction might prohibit the debtor bank to share details on the block setting.</p> <p>We don't think the creditor will benefit from having a detail on the block setting. The creditor's next step will remain unchanged.</p>
Finance Denmark	There is no clear opinion from DK Community to this Change Request.
Finance Finland	We don't see these codes very useful.
FINECOBANK SPA	Yes, we agree with the Change Request.



Contributor	Comments received
Fiserv	There would be data privacy issues to further refine r-transaction reason codes beyond what is available today.
French Banking Federation	French Banking Community does not support the proposal. These 4 new reasons concern specific demands made by the debtors to their bank. These reasons concern the way debtors manage their account and they could disagree to communicate such details to their creditors. That's why we think SL01 as a whole is well adapted in these cases.
German Banking Industry Committee (GBIC)	We do not support the change request ("No"). Cannot be part of the existing scheme (option e).
Italian Banking Association	Italian banks do not support this CR. The right of the Debtor to instruct its PSP to limit a direct debit to a certain amount/periodicity or to block any direct debit/direct debits received by specific Payees derives from Regulation 260/2012. It is not appropriate to provide the Beneficiary with this detailed information, since it is part of the contractual agreement between the Debtor and its PSP. The generic SL01 code is sufficient in these circumstances.
Portuguese Banking Association	We support the CR. In line with CR #45 and CR #48.
Satispay Europe	Satispay faces with the problem to communicate properly to our customers (which are debtor and creditor at the same time as the SDD is used to top-up their e-money account) why their first SDD fail with SL01 reason code really often: normally we communicate a generic “your bank account has some block that could be..., you must remove it or contact your bank”, have a more specific code will surely help us doing a better communication. What we suggest anyway is to depreciate the old SL01 (or at least change it to another code for countries where a more specific information is not allowed) in order to force PSPs to properly manage them, otherwise there is the concrete risk that PSPs will continue using SL01 for simplicity.
SIX on behalf of Swiss Banking Community	This is "personal" information from the debtor, thus it is in his authority and should not be presented back to the beneficiary. Not to be incorporated in scheme. In CH those codes won't be used.
Slovak Banking Association	We DO NOT support this change request as we do not see the need of additional r-transaction reason codes. Existing r-transaction reason codes are sufficient.
Spanish Association of CFOs (ASSET)	No opinion.
Spanish Banking Community	New r-transaction reason codes are not necessary.



Contributor	Comments received
STUZZA GmbH on behalf of Austrian Banking Community	Due to concerns in regards to data-protection we do not support this change request (see also item 45).
UK Finance	No opinion.

iv. SMB decision

Not to be included in the 2021 SDD Core rulebook.



11) # 35: Align the rulebook with the Funds Transfer Regulation

i. 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.

ii. 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.

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request cannot be part of the scheme.

Therefore, the SEMWG proposes not to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

No comments were submitted.

iv. SMB decision

Not to be included in the 2021 SDD Core rulebook.



12) # 43: Replacement of the term Bank with PSP and updated Customer definition

i. 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”.

ii. SEMWG analysis and recommendation

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

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The large majority of EPC scheme participants (via national communities or via individual comments) and other contributors to the 2020 public consultation supported the SEMWG recommendation that this change request can be part of the scheme.

Therefore, the SEMWG proposes to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
French Banking Federation	Yes. Note that to replace bluntly the term Bank by the term PSP can be confusing as some PSPs (PISP and AISP) are not allowed to be scheme payment participants. The term ASPSP seems more consistent as an ASPSP is always eligible to become scheme participant.
German Banking Industry Committee (GBIC)	No. Cannot be part of the existing scheme (option e).

iv. SMB decision

For inclusion in the 2021 SDD Core rulebook.



13) # 45: New r-transaction reason codes

i. 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.



ii. 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.

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) indicated that this change request cannot be part of the scheme.

Based on the number of the respondents not supporting this change request, the SEMWG proposes not to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Association des Banques et Banquiers Luxembourg (ABBL)	The change request cannot be part of the existing scheme. There are no demands from the creditors.
Bank Association of Slovenia	We do not need the new r-transaction reason codes SL11, SL12, SL13 and SL14. Reason code SL01 is sufficient.
Banking and Payments Federation Ireland	As per 24.
Bits / Finance Norway	Supported, see response nr 24.
Dutch Payments Association	In some communities, e.g. the Netherlands, many creditors, especially when processing a (very) large number of SDD transactions, have a strong need, to automate their (internal) processes in a fully Straight-Through- Processing (STP) way. Whenever a SDD transaction gets rejected or returned, they determine automatically, based on the reason code received, what their follow-up action will be and, preferably, they also automate that follow-up action by, e.g., generating and sending an e-mail to the debtor. In that e-mail they want to be specific, e.g. asking the debtor to update his/her whitelist. However, whenever the reason code received is rather generic, it is not possible to either automate the follow-up action or to be specific in that follow-up action and, thus, manual action will be required, which involves additional costs. So, more specific reason codes are required to help these creditors and by making the use of these reason codes optional, there will be no obligation for communities where there is no need for these reason codes.
Electronic Money Association	No opinion.
equensWorldline	Please refer to 24. Our preference is Nr. 24.



Contributor	Comments received
European Association for the Co-ordination of Consumer Representation in Standardisation (ANEC)	Same as item 24.
Febelfin Belgium	<p>We do not see a need for new reason codes. Local legal restriction might prohibit the debtor bank to share details on the block setting.</p> <p>We do not think the creditor will benefit from having a detail on the block setting. The creditor's next step will remain unchanged.</p>
Finance Denmark	There is no clear opinion from DK Community to this Change Request.
Finance Finland	We do not see these codes very useful.
FINECOBANK SPA	Yes, we agree with the Change Request.
Fiserv	There would be data privacy issues to further refine r-transaction reason codes beyond what is available today.
French Banking Federation	French Banking Community does not support the proposal. These 4 new reasons concern specific demands made by the debtors to their bank. These reasons concern the way debtors manage their account and they could disagree to communicate such details to their creditors. That is why we think SL01 as a whole is well adapted in these cases.
German Banking Industry Committee (GBIC)	We do not support the change request ("No"). Cannot be part of the existing scheme (option e).
Italian Banking Association	Italian banks do not support this CR. The right of the Debtor to instruct its PSP to limit a direct debit to a certain amount/periodicity or to block any direct debit/direct debits received by specific Payees derives from Regulation 260/2012. It is not appropriate to provide the Beneficiary with this detailed information, since it is part of the contractual agreement between the Debtor and its PSP. The generic SL01 code is sufficient in these circumstances.
Portuguese Banking Association	We support the CR. In line with CR #24 and CR #48.
Satsipay Europe	Satsipay faces with the problem to communicate properly to our customers (which are debtor and creditor at the same time as the SDD is used to top-up their e-money account) why their first SDD fail with SL01 reason code really often: normally we communicate a generic “your bank account has some block that could be..., you must remove it or contact your bank”, have a more specific code will surely help us doing a better communication. What we suggest anyway is to depreciate the



Contributor	Comments received
	old SL01 (or at least change it to another code for countries where a more specific information is not allowed) in order to force PSPs to properly manage them, otherwise there is the concrete risk that PSPs will continue using SL01 for simplicity.
SIX on behalf of Swiss Banking Community	See 24.
Slovak Banking Association	We DO NOT support this change request as we do not see the need of additional r-transaction reason codes. Existing r-transaction reason codes are sufficient.
Spanish Association of CFOs (ASSET)	No opinion.
Spanish Banking Community	New r-transaction reason codes are not necessary.
STUZZA GmbH on behalf of Austrian Banking Community	Due to concerns in regards to data-protection we do not support this change request (see also item 24).
UK Finance	No opinion.

iv. SMB decision

Not to be included in the 2021 SDD Core rulebook.



14) # 46: Change request has been withdrawn

i. Description

This change request has been withdrawn.



15) # 47: Change request has been withdrawn

i. Description

This change request has been withdrawn.



16) # 48: New r-transaction reason codes

i. 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.



ii. 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.

iii. SEMWG change proposal and explicit public consultation comments received

SEMWG change proposal

The vast majority of EPC scheme participants (via national communities or via individual comments) indicated that this change request cannot be part of the scheme.

Based on the number of the respondents not supporting this change request, the SEMWG proposes not to include this change request in the 2021 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Association des Banques et Banquiers Luxembourg (ABBL)	The change request cannot be part of the existing scheme. There are no demands from the creditors.
Bank Association of Slovenia	We do not need the new r-transaction reason codes SL11, SL12, SL13 and SL14. Reason code SL01 is sufficient.
Banking and Payments Federation Ireland	As per 24.
Bits / Finance Norway	Supported, see response nr 24.
Dutch Payments Association	In some communities, e.g. the Netherlands, many creditors, especially when processing a (very) large number of SDD transactions, have a strong need, to automate their (internal) processes in a fully Straight-Through- Processing (STP) way. Whenever a SDD transaction gets rejected or returned, they determine automatically, based on the reason code received, what their follow-up action will be and, preferably, they also automate that follow-up action by, e.g., generating and sending an e-mail to the debtor. In that e-mail they want to be specific, e.g. asking the debtor to update his/her whitelist. However, whenever the reason code received is rather generic, it is not possible to either automate the follow-up action or to be specific in that follow-up action and, thus, manual action will be required, which involves additional costs. So, more specific reason codes are required to help these creditors and by making the use of these reason codes optional, there will be no obligation for communities where there is no need for these reason codes.
Electronic Money Association	No opinion.
equensWorldline	Please refer to 24. Our preference is Nr. 24.



Contributor	Comments received
European Association for the Co-ordination of Consumer Representation in Standardisation (ANEC)	Same as item 24.
Febelfin Belgium	<p>We do not see a need for new reason codes. Local legal restriction might prohibit the debtor bank to share details on the block setting.</p> <p>We do not think the creditor will benefit from having a detail on the block setting. The creditor's next step will remain unchanged.</p>
Finance Denmark	There is no clear opinion from DK Community to this Change Request.
Finance Finland	We don't see these codes very useful.
FINECOBANK SPA	Yes, we agree with the Change Request.
Fiserv	There would be data privacy issues to further refine r-transaction reason codes beyond what is available today.
French Banking Federation	French Banking Community does not support the proposal. These 4 new reasons concern specific demands made by the debtors to their bank. These reasons concern the way debtors manage their account and they could disagree to communicate such details to their creditors. That's why we think SL01 as a whole is well adapted in these cases.
German Banking Industry Committee (GBIC)	We do not support the change request ("No"). Cannot be part of the existing scheme (option e).
Italian Banking Association	Italian banks do not support this CR. The right of the Debtor to instruct its PSP to limit a direct debit to a certain amount/periodicity or to block any direct debit/direct debits received by specific Payees derives from Regulation 260/2012. It is not appropriate to provide the Beneficiary with this detailed information since it is part of the contractual agreement between the Debtor and its PSP. The generic SL01 code is sufficient in these circumstances.
Portuguese Banking Association	We support CR. In line with CR #24 and CR #45"
Satsipay Europe	Satsipay faces with the problem to communicate properly to our customers (which are debtor and creditor at the same time as the SDD is used to top-up their e-money account) why their first SDD fail with SL01 reason code really often: normally we communicate a generic "your bank account has some block that could be..., you must remove it or contact your bank", have a more specific code will surely help us doing a better communication. What we suggest anyway is to depreciate the



Contributor	Comments received
	old SL01 (or at least change it to another code for countries where a more specific information is not allowed) in order to force PSPs to properly manage them, otherwise there is the concrete risk that PSPs will continue using SL01 for simplicity.
SIX on behalf of Swiss Banking Community	See 24.
Slovak Banking Association	We DO NOT support this change request as we do not see the need of additional r-transaction reason codes. Existing r-transaction reason codes are sufficient.
Spanish Association of CFOs (ASSET)	No opinion.
Spanish Banking Community	New r-transaction reason codes are not necessary.
STUZZA GmbH on behalf of Austrian Banking Community	Due to concerns in regards to data-protection we do not support this change request.
UK Finance	No opinion.

iv. SMB decision

Not to be included in the 2021 SDD Core rulebook.



5 Changes Pertaining to the Impact of the SEPA Regulation or any Other EU Legislation (“Regulatory Change Proposal Submission Document”⁶)

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 a public consultation. They are included in this document for information.

At the start of the public consultation

One change item was identified that required a change to the rulebook due to a particular EU legislation. It concerned a re-arrangement of the list of non-EEA SEPA authorisation references in the four EPC SEPA payment scheme rulebooks.

This change had been qualified as “Change for Regulatory Reasons” within the meaning of Section 4.2.9 of the of the SEPA Payment Scheme Management Rules, due to legal amendments that “necessitate the urgent alignment of the Schemes with such rules and regulations”.

The contributors to this public consultation were invited to comment on this change. No comments during the public consultation has been addressed.

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"> iii) Andorra (2018), and iv) 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>

⁶ This section 5 contains the so-called Regulatory Change Proposal Submission Document as referred to in Section 4.2.9 of the SEPA Payment Scheme Management Rules.



Change	Reason for change
	<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> <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>



Change	Reason for change
	<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> <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"> iii) maintain a complete reference in the Rulebooks to the relevant authorisation requirements, covering both EEA and non-EEA SEPA countries, and iv) 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>

During or after the public consultation

No new regulatory and payment scheme oversight matters were brought to the attention of the EPC.



6 Change Management Process in Respect of Minor Changes

1) Publication of list of minor changes

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

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

This obligation had been met by the publication of the SDD Core Rulebook 2020 Change Request Public Consultation Document (EPC003-20) on 12 March 2020, and in particular the provisions under section 4 of that document noting certain changes as 'minor' in this specific document.

2) Comments on the minor changes during the public consultation

All stakeholders had the opportunity to submit comments on the list of minor changes covered in the SDD Core Rulebook 2020 Change Request Public Consultation Document.

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

3) Submission of the list of minor changes to the SMB

The list of minor changes had been submitted to the SMB via this SDD Core Change Proposal Submission Document in accordance with section 4.2.5 of the SEPA Payment Scheme Management Rules.



4) Minor changes taken up in the SDD Core rulebook to take effect in 21 November 2021

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



7 Annex I

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

Input from:	List of contributors
Individual PSPs and (national) communities of PSPs	<ol style="list-style-type: none"> 1. Association des Banques et Banquiers Luxembourg (ABBL) 2. Bank Association of Slovenia 3. Banking and Payments Federation Ireland 4. BITS /Finance Norway 5. Dutch Payments Association 6. Electronic Money Association 7. Febelfin Belgium 8. Finance Denmark 9. Finance Finland 10. FINECOBANK SPA 11. French Banking Federation 12. German Banking Industry Committee (GBIC) 13. Italian Banking Association 14. Portuguese Banking Association 15. Satispay Europe SA 16. SIX on behalf of Swiss Banking Community 17. Slovak Banking Association 18. Spanish Banking Community 19. STUZZA GmbH on behalf of Austrian Banking Community 20. UK Finance
Other stakeholders	<ol style="list-style-type: none"> 1. equensWorldline 2. European Association for the Co-ordination of Consumer Representation in Standardisation (ANEC) 3. Fiserv 4. Spanish Association of CFOs (ASSET)