



SEPA Direct Debit Core Rulebook

Change Proposal Submission Document Following the 2022 Public Consultation on SDD Core Change Requests

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Change Proposal Submission Document on 2022 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 2022 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 2023 versions of the SCT and SDD rulebooks will be published exceptionally on 25 May 2022. Based on the established release management cycle, these versions will take effect on 19 November 2023.

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. For the 2022 change management cycle, this was exceptionally done in the third quarter of 2021.

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 **EPC Scheme End-User Multi-Stakeholder Group (SEU MSG)** and the **EPC Scheme Technical Player Multi-Stakeholder Group (STP MSG)**.

The roles of the SEU MSG and the STP MSG are described in section 4.4 of the SEPA Payment Scheme Management Rules. The SEU MSG and the STP MSG 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 (EP007-22) describes that each stage of the 2022 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 30 June 2021. The EPC received **11** 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 13 September and 11 December 2021. The EPC received input from 17 (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 2022 Change Request Public Consultation Document (EPC158-21) and the Response Template (EPC162-21). 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 SEU MSG and the STP MSG for their consideration;
- e) The SMB decision on each SEMWG change proposal.

The SMB took into account the position documents **EPC 038-22** and **EPC 039-22** from the SEU MSG and the STP MSG respectively when making its decision on each change request and the related SEMWG change proposal.

As a result of the 2022 SDD Core rulebook change management process, the SDD Core rulebook has been updated to include the following changes:

A. 2022 change requests entering into force on 25 April 2023

On 25 April 2023, a new composition of the SMB will take up its mandate.

With respect to the SEPA Payment Scheme Management Rules being Annex II of each SEPA payment scheme rulebook, a new composition formula will be applied for allocating the seats of scheme participant-related SMB members. Also, more seats will be reserved for the scheme participant-related SMB members. As of 25 April 2023, the SMB will be renamed into the PSMB (Payment Scheme Management Board).

B. 2022 change requests entering into force on 19 November 2023

- To formally enable the SEPA payment schemes to cater for both retail and Financial Institution-to-Financial Institution payment use cases, the term 'Customer' is replaced by the term 'Payment Service User' (PSU) including an appropriate definition for this new term.

The definitions of the terms 'Creditor' and 'Debtor' are amended whereby also PSPs can take up these roles. Related to this, the definition of the term 'Payment Account' is changed indicating that such account can be held by a PSP as well. Also, some obligations of the



Creditor PSP and of the Debtor PSP in the concerned rulebook sections 5.7 and 5.8 are amended.

- Provision of the structured address of the payment end-user:

As of 19 November 2023, payment end users are allowed to send a structured address of the payer and/or the payee in electronic Customer-to-PSP files based on at least the relevant EPC Customer-to-PSP Implementation Guidelines (IGs) for SEPA payments. From that same date, also scheme participants are allowed to provide structured addresses in their inter-PSP SEPA payment messages and r-transactions.

In view of the above, all scheme participants must be able to support the delivery of structured addresses when payment end users and scheme participants want a structured address in their outgoing and incoming SEPA payments. Scheme participants cannot reject SEPA payments only due to the inclusion of a structured address.

The use of an unstructured address will still be possible and supported by the SEPA payment schemes until November 2025.

- Extra clarifications about the charging principles.

Important reminder: back in 2020, the SMB already decided upon the following changes for all four 2023 SEPA payment scheme rulebooks:

- Migrate all ISO 20022 standard-based XML payment messages used under the schemes, to the 2019 version of the ISO 20022 standard; and
- Align all attribute numbers in the scheme rulebooks as of the 2023 rulebooks.

C. 2022 change requests entering into force in November 2025

With respect to the provision of the structured address of the payment end-user, the use of the structured address will become **mandatory** for Inter-PSP SEPA payment messages where applicable, and for payment end users when they send electronic Customer-to-PSP files based on at least the relevant EPC Customer-to-PSP IGs. The use of an unstructured address will no longer be allowed and will hence lead to rejects.

Overview of the 2022 SDD Core change requests and the final SMB decision

Item	Change request title	SMB decision
03	Change of the term 'Customer'	For inclusion in the 2023 SDD Core rulebook.
05	Mandatory behaviour for Debtor PSPs for incoming SDD collections	Not to be included in the 2023 SDD Core rulebook.
06	Provision of the structured address of the payment end-user	For inclusion in the 2023 and 2025 SDD Core rulebooks.
08	Clarification on charges	For inclusion in the 2023 SDD Core rulebook.
09	Reduce Return period from 5 to 3 Interbank Business Days	Not to be included in the 2023 SDD Core rulebook.
10	Extension of the period for submitting a Reversal	Not to be included in the 2023 SDD Core rulebook.



Item	Change request title	SMB decision
13	Reduction of SDD processing cycle from up to D-1 to Due Date	Not to be included in the 2023 SDD Core rulebook.
14	Pain.002 message to be compliant with SWIFT CGI-MP standard	Not to be included in the 2023 SDD Core rulebook.
21	Reduction of Refund period from 8 weeks to 31 days	Not to be included in the 2023 SDD Core rulebook.
24	More specific codes instead of reason code SL01	Not to be included in the 2023 SDD Core rulebook.
25	Changes to the SEPA Payment Scheme Management Rules	Such decision is not within the remit of the SMB. The EPC Board has taken the following decision: for inclusion in the SDD Core scheme as of April 2023.



3 Overview of Change Requests Submitted for the 2022 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.**

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"	Total	Percentage "Yes" in total responses
3	Change of the term 'Customer'	Terminology	Inclusion into the scheme (option b) as of Nov 2023	16	0	1	17	100%
5	Mandatory behaviour for Debtor PSPs for incoming SDD collections	Scheme compliance	Cannot be part of the existing scheme (option e)	17	0	0	17	100%
6	Provision of the structured address of the payment end-user	Use of structured data	Inclusion into the scheme (option b) as of Nov 2023	14	2	1	17	88%
8	Clarification on charges	Charging	Inclusion into the scheme (option b) as of Nov 2023	16	0	1	17	100%
9	Reduce Return period from 5 to 3 Interbank Business Days	Timeline changes	Cannot be part of the existing scheme (option e)	15	1	1	17	94%
10	Extension of the period for submitting a Reversal	Timeline changes	Cannot be part of the existing scheme (option e)	12	4	1	17	75%
13	Reduction of SDD processing cycle from up to D-1 to Due Date	Timeline changes	Cannot be part of the existing scheme (option e)	16	1	0	17	94%
14	Pain.002 message to be compliant with SWIFT CGI-MP standard	Use of standards	Cannot be part of the existing scheme (option e)	15	0	2	17	100%
21	Reduction of Refund period from 8 weeks to 31 days	Timeline changes	Cannot be part of the existing scheme (option e)	16	0	1	17	100%
24	More specific codes instead of reason code SL01	R-transactions	Cannot be part of the existing scheme (option e)	14	3	0	17	82%
25	Changes to the SEPA Payment Scheme Management Rules	Internal Rules	Inclusion into the scheme (option b) as of April 2023	16	1	0	17	94%

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"	Total	Percentage "Yes" in total responses
3	Change of the term 'Customer'	Terminology	Inclusion into the scheme (option b) as of Nov 2023	2	0	1	3	100%
5	Mandatory behaviour for Debtor PSPs for incoming SDD collections	Scheme compliance	Cannot be part of the existing scheme (option e)	2	0	1	3	100%
6	Provision of the structured address of the payment end-user	Use of structured data	Inclusion into the scheme (option b) as of Nov 2023	3	0	0	3	100%
8	Clarification on charges	Charging	Inclusion into the scheme (option b) as of Nov 2023	2	0	1	3	100%
9	Reduce Return period from 5 to 3 Interbank Business Days	Timeline changes	Cannot be part of the existing scheme (option e)	2	0	1	3	100%
10	Extension of the period for submitting a Reversal	Timeline changes	Cannot be part of the existing scheme (option e)	2	0	1	3	100%
13	Reduction of SDD processing cycle from up to D-1 to Due Date	Timeline changes	Cannot be part of the existing scheme (option e)	2	0	1	3	100%
14	Pain.002 message to be compliant with SWIFT CGI-MP standard	Use of standards	Cannot be part of the existing scheme (option e)	2	0	1	3	100%
21	Reduction of Refund period from 8 weeks to 31 days	Timeline changes	Cannot be part of the existing scheme (option e)	2	0	1	3	100%
24	More specific codes instead of reason code SL01	R-transactions	Cannot be part of the existing scheme (option e)	1	0	2	3	100%
25	Changes to the SEPA Payment Scheme Management Rules	Internal Rules	Inclusion into the scheme (option b) as of April 2023	2	0	1	3	100%



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

No change item was identified at the time of the start of the public consultation that required a change to the SDD Core rulebook due to a particular EU legislation.

No items have been identified that require a change to the SDD Core scheme rulebook due to any EU legislation.



4 Major Change Request Details, Related Public Consultation Comments and the SEMWG Change Proposal

1) # 03: Change of the term 'Customer'

i. Description

This change request was made by the EPC secretariat.

As of the 2021 rulebook, the term 'Customer' is currently defined as *"A physical or legal entity that is not active in the business of providing payment accounts used for the execution of payments and that is therefore not eligible for scheme participation"*.

The definition in the 2021 rulebook and its limitation does not make sufficiently clear that also a PSP may act in the capacity of a Creditor or Debtor under the rules of the scheme. A good example are the payments an PSP makes with respect to salary payments, office rent etc.

Furthermore, reflections have been made on whether the scheme should cater also for use cases in which PSPs are making use of the payment scheme as Creditor and/or as Debtor in the context of Financial Institution – to – Financial Institution (Fi2Fi) payments, and whether the term 'Customer' is appropriate in such context.

In order to adapt the rulebook to support the case of a PSP acting as Creditor/Debtor in both, retail and Fi2Fi use cases, while complying with applicable law, the suggestion is to:

- i) replace the term 'Customer' with the term 'Payment Service User' ('PSU'), and define it on the basis of the definition of 'PSU' provided under the Payment Services Directive (PSD2). This will clearly identify who can take up the role of PSU and the relevant legal framework applicable to them;
- ii) amend the terms 'Creditor' and 'Debtor' to cover use-cases in which a PSP is making use of the scheme in an Fi2Fi context;
- iii) amend the term 'Payment Account' to clarify that a payment account should be used also in the context of an Fi2Fi payment, and
- iv) amend Sections 5.7 and 5.8 to ensure that that PSPs wishing to make use of the scheme for Fi2Fi transactions as Creditor/Debtor do so in full compliance with the rules of the scheme, while being subject to applicable law.

ii. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2023**.

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 2022 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 2023 SDD Core rulebook version 1.0.

**Explicit public consultation comments received**

Contributor	Comments received
French Banking Federation	<p>Yes. We agree with the proposed change request as it is mentioned that the new definition will allow to cover the financial to financial (Fi2Fi) use case in which two PSPs make payment as an originator or a beneficiary on behalf of their ultimate customers.</p> <p>Such definition will be appropriate to cover upcoming solution aiming to address the customer to merchant use cases.</p>

iv. SMB decision

For inclusion in the 2023 SDD Core rulebook.



2) # 05: Mandatory behaviour for Debtor PSPs for incoming SDD collections

i. Description

This change request was made by Satispay Europe SA.

Under the SDD Core scheme, the Debtor PSP is not obliged to perform any checks with respect to the provided mandate-related information in the first or any subsequent SDD Core collection. However, the SEPA Regulation obliges Debtor PSPs to offer Debtors the option to block their account for direct debit transactions in case of four reasons.

The contributor being a SDD Core scheme participant reports that there are Debtor PSPs that, according to their commercial strategies, prevent all SDD Core operations for all of their customers, requesting authorization for each new mandate. The Debtor PSP requests the information about the SDD Core mandate from the Debtor, before executing the collection on the Debtor's account, using the same logic that is mandatory for SDD B2B although the refund rights are totally different.

The contributor finds that such behaviour is not efficient for SDD Core processing. It extends the time for a direct debit, forcing the Debtors to an unnecessary, often unexpected communication to their Debtor PSP and reducing the difference between SDD Core and SDD B2B. It should be avoided for Debtor PSPs to prevent direct debit operations by default for all their clients. The standardized approach should be that the collections must be accepted for further processing unless the customer expressly states that it wishes to block them in advance.

ii. SEMWG analysis and recommendation

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

The SEMWG considers this change request more as a concrete complaint against certain Debtor PSPs. The SDD Core scheme rulebook is clear on what the Debtor PSP is expected to do when receiving a collection. The alleged reported practice is not allowed.

The SEMWG strongly recommends this contributor and any other SDD Core Creditor PSP which may be confronted with similar practices from SDD Core Debtor PSPs, to share more concrete information about the concerned Debtor PSPs and the SDD Core collections with the EPC secretariat via secretariat@epc-cep.eu at any time. The EPC would then consider the most appropriate actions towards the concerned Debtor PSPs.

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 2022 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 2023 SDD Core rulebook version 1.0.

**Explicit public consultation comments received**

Contributor	Comments received
Italian Banking Association	Yes. These additional services that are provided to protect the customer are outside the scope of the Rulebook even though they comply with the payment schemes. This change request would have large impacts on the services offered to customers and currently contractualized with them.
Satispay Europe SA	Yes. We agree with the decision and we wait for the appropriate actions to solve the described behaviour.

iv. SMB decision

Not to be included in the 2023 SDD Core rulebook.



3) # 06: Provision of the structured address of the payment end-user

i. Description

This change request was made by the SEMWG.

The first part of the suggestion is **to allow** payment end users to send a **structured** address of

- The payer (i.e. the Originator in SCT and SCT Inst transactions, and the Debtor in SDD Core and SDD B2B transactions); and/or
- The payee (i.e. the Beneficiary in SCT and SCT Inst transactions, and the Creditor in SDD Core and SDD B2B transactions)

in electronic Customer-to-PSP files based at least on the relevant EPC Customer-to-PSP Implementation Guidelines for SCT, SCT Inst, SDD Core and SDD B2B transactions **as of November 2023**. From that same date, also SEPA payment scheme participants are allowed to provide structured addresses in their inter-PSP SEPA payment messages and r-transactions.

In view of the above, the second part of the suggestion is that as of the November 2023 SEPA payment scheme rulebooks, all scheme participants must be able to support the delivery of structured addresses when payment end users and scheme participants want a structured address in their outgoing and incoming SEPA payment transactions. From November 2023 onwards, scheme participants cannot reject SEPA payment transactions only due to the inclusion of a structured address.

The use of an unstructured address will still be possible and supported by the SEPA payment schemes until November 2025.

The period between November 2023 and November 2025 should be used by payment end users to upgrade their payment-related systems/applications and to organise the migration from the use of unstructured to structured addresses in their databases to avoid a big bang migration in November 2025 and possible rejects of SEPA payment transactions.

The third part of the suggestion is that as of the **November 2025** entry-into-force date of all SEPA payment scheme rulebooks, the use of the structured address will become **mandatory** for Inter-PSP SEPA payment messages where applicable, and for payment end users when they send electronic Customer-to-PSP files based at least on the relevant EPC Customer-to-PSP Implementation Guidelines. The use of an **unstructured** address will **no longer be allowed and will hence lead to rejects**.

With the exclusive use of structured addresses as of November 2025, the SEPA payment schemes will be aligned with the deadline set for the use of the structured address under the CBPR+ specifications. These specifications define how ISO 20022 should be used for cross-border payments and cash reporting on the SWIFT network. The SWIFT community decided to move cross-border and correspondent banking from SWIFT MT messages to ISO 20022 standard-based XML messages by November 2025.

The use of structured addresses in SEPA payment transactions, gives the potential to reduce errors in payment processing, regulatory screening, and reconciliation, thereby increasing the straight-through-processing of SEPA payment transactions.



ii. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) as follows:

- As of November 2023: SEPA payment scheme participants must be able to support structured addresses when provided by the payment end user and/or the scheme participant; **and**
- As of November 2025: payment end users can only provide structured addresses in their electronic Customer-to-PSP files based at least on the relevant EPC Customer-to-PSP Implementation Guidelines; and all Inter-PSP SEPA payment messages must contain a structured address where applicable.

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 2022 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 for inclusion in the:

- 2023 rulebook version 1.0: SEPA payment scheme participants must be able to support structured addresses when provided by the payment end user and/or the scheme participant.
- 2025 rulebook version 1.0: payment end users can only provide structured addresses in their electronic Customer-to-PSP files at least based on the relevant EPC Customer-to-PSP Implementation Guidelines; and all Inter-PSP SEPA payment messages must contain a structured address where applicable.

Explicit public consultation comments received

Contributor	Comments received
French Banking Federation	No. No consensus has been found among French PSPs on this matter.
Italian Banking Association	Yes. The ongoing work on the guidelines/clarifications is important to drive the migration from non-structured addresses to Structured ones, in order to mitigate the customer impacts during the transition period. The possibility to handle the structured and the non-structured addresses together until 2025 (mostly for bulk payments) should be deeply analysed in order to assess properly the IT impacts. Furthermore, during the transition period, it should be clearly defined which address is relevant if both (structured and non-structured) are filled in (if this circumstance is possible). From 2025 on, it should be clarified at which point of the payment chain the reject will be initiated (e.g. by the CSMs?). The impact on the client reporting should also be evaluated.
Oracle Software	Yes. We support the use of structured addresses, for the following reasons: - It will benefit the bank statement reconciliation process. Additional structured data will results in higher automatic



Contributor	Comments received
	reconciliation rates between payments and invoices, that will eventually lead to lower manual work. - It will reduce the risk of incorrect payments. Structured address data ensures a higher level of payee identification and validation, resulting in lower risk of companies performing payments to the wrong payee.
Spanish Banking Community	No. We think that it is not necessary to implement this measure, it would have a great impact on customers.

iv. SMB decision

For inclusion in the 2023 and 2025 SDD Core rulebooks.



4) # 08: Clarification on charges

i. Description

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

The contributor points out that charges are entirely out of the scope of the SEPA payment scheme rulebooks. They are subject to the PSPs' commercial charging policies, which depending on where the PSP(s) involved in the transaction is/are located, are subject to applicable law.

For intra-EEA SEPA transactions occurring between PSPs located in different EEA countries, these policies are subject to the Regulation (EC) 924/2009 requiring that charges for cross-border payments within the EEA are the same as those for payments of the same value and in the same currency within a (EEA) Member State.

This is not the case for transactions to/from a PSP located in a non-EEA SEPA country, which being third countries from the European law perspective are not subject to the provisions of the Regulation (EC) 924/2009. Accordingly, charges within and to/from a non-EEA SEPA country remain only subject to applicable national law and the relevant transparency and information requirements between scheme participants and their customers under the SEPA payment scheme rulebooks.

The contributor suggests a few changes to the rulebook for transparency and clarification purposes.

ii. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2023**.

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 2022 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 2023 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Portuguese Banking Association	Yes. Please note that Regulation (EC) 924/2009 was replaced by Regulation (EU) 2021/1230 of 14 July 2021.

iv. SMB decision

For inclusion in the 2023 SDD Core rulebook.



5) # 09: Reduce Return period from 5 to 3 Interbank Business Days

i. Description

This change request was made by Satispay Europe SA.

The SDD Core scheme rulebook allows for the Return of a collection up to 5 Inter-PSP Business Days after the Settlement Date.

Given the current technological environment of the SDD Core scheme participants, the contributor is of the opinion that PSPs can send such Return in a shorter time. It proposes reducing the current Return period from 5 Interbank Business Days to 3 Interbank Business Days.

Based on its own SDD Core collection processing experience, the contributor claims that almost 90 percent of the Returns are sent within the proposed shorter timeline.

Such change would also harmonize the SDD Core Return period with the one set for the SDD B2B scheme being already 3 Interbank Business Days.

ii. SEMWG analysis and recommendation

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

A shorter Return period would increase the rate of SDD Core r-transactions. Several scheme participants try to resolve the issue during the allowed Return period by contacting the SDD Debtor being mainly a consumer.

The SDD Core Return period of D+5 was a compromise between the Creditor driven-Mandate-Flow (CMF) countries and the Debtor driven-Mandate-Flow (DMF) countries back in 2006-2007.

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 2022 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 2023 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Italian Banking Association	Yes. The reasons supporting the return deadline cannot depend only to technical aspects but should also take into account the processes at PSP level. Furthermore, since the 3-day deadline is already operationally met, there is no need to establish it in the scheme increasing compliance risks.
Satispay Europe SA	No. Based on our experience, the majority of PSPs are sending returns in the suggest timeframe. For this reason we do not expect any major impact on the volume of r-transactions.

iv. SMB decision

Not to be included in the 2023 SDD Core rulebook.



6) # 10: Extension of the period for submitting a Reversal

i. Description

This change request was made by the French Banking Federation.

The Creditor PSP has currently 5 Inter-PSP Business Days following the settlement date of a SDD collection to initiate a Reversal.

The contributor suggests extending this Reversal period to 10 Inter-PSP Business Days, as erroneous SDD collections can still be detected by the Creditor or the Creditor PSP after the current maximum period of 5 days.

The contributor is of the opinion that extending the current timespan would avoid:

- Conflicts with other r-transactions types, especially Returns, which must also take place within a maximum period of 5 Inter-PSP Business Days after the settlement date;
- Asking the Debtor Bank to initiate a Refund;
- Making a reconciliation, if a credit transfer is agreed upon by both Creditor and Debtor to recover the funds.

With 10 Inter-PSP Business Days, more erroneous SDD collections could be processed autonomously by the Creditor PSP without the need to seek intervention from the Debtor PSP.

ii. SEMWG analysis and recommendation

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

The need to do a Reversal is due to an error by the Creditor. Extending the timespan to 10 days in which a Reversal can be done will cause increasing conflicts with other r-transaction types (e.g., a Refund).

It is expected that the Creditor rectifies its error as soon as possible. The Creditor may agree with the Debtor to recover the funds outside of the scheme (e.g., by credit transfer).

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 2022 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 2023 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
French Banking Federation	<p>No. We keep on supporting our initial proposal. Expanding the time-line from 5 to 10 days to send a reversal will ease this exception process by giving Creditor PSP and its customer more time to send the appropriate R-transaction.</p> <p>Furthermore, it would prevent from diverting the scheme rules such as sending Refunds as a way to solve the issue. Last we do not consider the sending of an SCT from the debtor PSP to the</p>



Contributor	Comments received
	creditor PSP as an adequate way to reverse a previous SDD collection (due to reconciliation issue).
Italian Banking Association	Yes. This need has never been expressed by customers so we do not believe there is a real need to include it in the scheme. However, it must be considered that this change would have significant impacts in order to be implemented.
Satispay Europe SA	No. Extending the reversal period would allow to reverse the operation also in case where Debtors change their mind about the service offered and the collection and when the Creditor concludes that a Collection should not have been processed, as stated in the Rulebook.
Spanish Banking Community	No. We think that it is interesting to extend the period for submitting 'reversals' to offer a better service to customers. We understand that the crossing of R's has already been resolved from a technical point of view and it will not mean an increase in incidents and whether a better service to customers.

iv. SMB decision

Not to be included in the 2023 SDD Core rulebook.



7) # 13: Reduction of SDD processing cycle from up to D-1 to Due Date (D)

i. Description

This change request was made by Satispay Europe SA.

Since November 2016 onwards, all SDD collections can be presented up to D-1 Inter-Bank Business Day (D-1). Given the current technological developments, the contributor's view is that it should be possible to present a SDD collection on the same day as the Settlement Date. Therefore, the contributor suggests reducing the SDD collection processing cycle from up to D-1 to the Due Date (D).

This change would result in a faster availability of the funds for the Creditors. A faster r-transaction handling would also be achieved as the timeframe of the SDD R-transaction would start earlier.

ii. SEMWG analysis and recommendation

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

A reduction could increase the rate of SDD r-transactions. Several Debtor PSPs may conduct some validation checks on D-1.

The 'pre-notification' feature would become useless as the intention to provide the Debtor with upfront debiting information (on D-1) to provide sufficient cover (at the latest on D) would no longer work.

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 2022 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 2023 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Italian Banking Association	<p>Yes. We do not support this change request for the following reasons:</p> <ul style="list-style-type: none"> - the sustainability of this solution should be verified from a legal perspective (with respect to art. 80 PSD2 related to the revocation of the payment order by the payer) - the D-1 deadline is useful for both the debtor and the creditor; among other reasons, the debtor should be notified at least one day before the settlement date in order to let him verify the availability of funds in his account. Furthermore, according to the B2B Rulebook the Debtor PSP could have to check the customer consent before debiting his account - this change could entail heavy operational implications



Contributor	Comments received
	- the impact would be large especially for those PSPs that manage direct debits with night batches.
Satispay Europe SA	No. When Creditor and Debtor agrees on different timeframe for pre-notification or through different channel, it would be possible to execute SDD on D. We do not expect any major impact on the volume of r-transactions.

iv. SMB decision

Not to be included in the 2023 SDD Core rulebook.



8) # 14: Pain.002 message to be compliant with SWIFT CGI-MP standard

i. Description

This change request was made by UniCredit AG Germany.

The contributor suggests that the pain.002.001.10 message should be compliant with the SWIFT Common Global Implementation (CGI)-MP standard, published in MyStandards.

The change request contains further technical details that apply only to the Customer-to-PSP implementation guidelines.

ii. SEMWG analysis and recommendation

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

For the suggestion to also allow PART as a valid status message, this is possible from a technical point of view. Code PART (PartiallyAccepted) already exists in ISO.

As for the suggestion to allow also additional info (on all statuses) for the status RJCT and ACWC to express more details to the Reject or changes, the rulebook currently foresees only RJCT. There is no need to add additional information for Reject reasons as stated in the rulebook.

As to also allow as an option – in addition to Reject – a positive pain.002 with the statuses ACTC, ACCP, ACWC, ACSC and ACCC, the scheme currently only describes Rejects and the implementation guidelines use pain.002 for indicating this Reject to the Creditor. The actual suggestion is to use pain.002 as a processing status report with all the possibilities of a processing status report, i.e. also positive reports. This means that the rulebook should foresee this and give guidance. The SEMWG sees such status reports being a part of the internal processes developed by each PSP concerned.

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 2022 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 2023 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Oracle Software	<p>Yes. We do not support this change request, for the following reasons:</p> <ul style="list-style-type: none"> - 'Reject' messages in its current form provide enough information to make the required changes and being able to re-submit the payment initiation request. - We do not see added value in supporting the 'Accept' messages. Many systems consider submitted payment initiation request as being approved and settled, unless rejected via a pain.002 message. 'Accept' messages will be ignored. However, allowing 'Accept' messages, will lead to



Contributor	Comments received
	more payment messages to be processed, resulting in additional payment message processing time.

iv. SMB decision

Not to be included in the 2023 SDD Core rulebook.



9) # 21: Reduction of Refund period from 8 weeks to 31 days

i. Description

This change request was made by UniCredit Bank Austria AG.

The contributor suggests the reduction of the SDD Core Refund period from 8 weeks to 31 days to minimize the reimbursement risk for the Creditor PSP.

This enables the Creditor PSP to reduce the liquidity provision to a shorter period of time and thus has the option of better risk calculation for the Creditor. Currently, around 90 percent of the returns/refunds are made in the first 14 days.

ii. SEMWG analysis and recommendation

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

The implementation of this change request would be a breach against article 77 (1) of the Payment Services Directive 2.

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 2022 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 2023 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Italian Banking Association	Yes. This change request is in contrast with Article 77 of the PSD2, which regulates requests for the refund of the payment, providing that the refund can be requested by the payer for a period of 8 weeks from the debit date. The impacts are therefore primarily regulatory and consequently contractual towards customers, being also a significant limitation of consumers' rights.

iv. SMB decision

Not to be included in the 2023 SDD Core rulebook.



10) # 24: More specific codes instead of reason code SL01

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 PSPs, 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 change request also describes 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 recommends not taking forward the change request (**option e**).

This change request had already been submitted in the 2020 scheme rulebook change management cycle. At that time, the vast majority of SDD scheme participants (via national communities or via individual comments) indicated that this change request could not be part of the scheme.

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 2022 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 2023 SDD Core rulebook version 1.0.

Explicit public consultation comments received

Contributor	Comments received
Dutch Payments Association	No. These extra reason codes are very helpful for Creditors in their communication with their debtors.
Italian Banking Association	Yes. We do not believe there is a real need to provide such detailed information, taking also into account the privacy issues.
Lloyds Banking Group	No. LBG supports this Change Request - provides additional clarity/transparency within the reason codes. Where local jurisdictions allow, transparency should be encouraged.
Satispay Europe SA	No. Additional reason codes would let creditors to provide more accurate communication with their Debtors and to solve more easily the underlying issue preventing the collection.

iv. SMB decision

Not to be included in the 2023 SDD Core rulebook.



11) # 25: Changes to the SEPA Payment Scheme Management Rules

i. Description

This change request was made by the EPC.

Each SEPA payment scheme rulebook contains an Annex II covering the SEPA Payment Scheme Management Rules ('Internal Rules'). The Internal Rules contain among others the Scheme Management Board (SMB) composition rules.

The EPC suggests renaming the SMB into the PSMB (Payment Scheme Management Board) and the SEMWG into the PSEMWG (Payment Scheme Evolution and Maintenance Working Group), in light of the creation of new payment-related schemes managed by the EPC.

Furthermore, the PSMB would be composed of up to 22 (instead of 20) representatives of SEPA payment scheme participants, subject to reaching individually or on a consolidated basis 3.5% (instead of 5%) of the following composition criterion: the total volume of credit transfers and direct debits of all national communities included with the geographical scope of the payment schemes.

At least 1 seat would be reserved for Payment Institutions and 1 seat for Electronic Money Institutions (even if they fail to reach the 3.5% threshold) (instead of 1 common seat for Payment Institutions and Electronic Money Institutions).

A cap of 4 (instead of 3) seats per national community from the euro area and 1 (unchanged) seat per national community from outside the euro area would apply.

ii. SEMWG analysis and recommendation

The SEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of the entry-into-force date of the new composition of the PSMB scheduled **at the end of April 2023**.

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 2022 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 scheme **as of April 2023**.

Explicit public consultation comments received

Contributor	Comments received
French Banking Federation	Yes. French Banking community is not against the proposed amendment of the PSMB composition rules. Anyhow we would like to stress that at some point in time all members of the future PSMB (included Payment Institutions and Electronic Money Institutions) should be submitted to the same rules regarding the representation in term of seats on the basis of the volume of SCT and SDD transactions.
National Westminster Bank Plc	No. We agree with the renaming of the SMB to PSMB and that it is composed of up to 22 representatives, subject to reaching individually or on a consolidated basis 3.5% as outlined in the



Contributor	Comments received
	<p>proposal. We also would agree with at least 1 seat being reserved for Payment Institutions and 1 seat for Electronic Money Institutions.</p> <p>We do not agree with increasing the cap to 4 seats per National Community from the euro area. The rationale and benefits have not been outlined.</p> <p>We agree with the SEMWG being renamed to PSEMWG.</p>
Satispay Europe SA	Yes. The change would allow more diversification of members and representation for new players such as Payment Institution and Electronic Money Institution.

iv. SMB decision

Such decision is not within the remit of the SMB. The EPC Board has taken the following decision: for inclusion in the SDD Core scheme as of **April 2023**.



5 Changes Pertaining to the Impact of the SEPA Regulation or any Other EU Legislation (“Regulatory Change Proposal Submission Document”³)

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

No change item was identified that required a change to the rulebook due to a particular EU legislation.

During or after the public consultation

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

³ 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.



6 Change Management Process in Respect of Minor Changes

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 2022 Change Request Public Consultation Document (EPC158-21) on 13 September 2021.

For this release management cycle, no minor changes had been raised at the start of or during the public consultation.



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. Bank Association of Slovenia 2. Banking and Payments Federation Ireland 3. Citi 4. Dutch Payments Association 5. Febelfin Belgium 6. Finance Finland (on behalf of the Finnish banking community) 7. French Banking Federation 8. German Banking Industry Committee (GBIC) on behalf of the German banking community and Deutsche Bundesbank. 9. Italian Banking Association 10. Lloyds Banking Group 11. National Westminster Bank Plc 12. Portuguese Banking Association 13. PSA Payment Services Austria GmbH 14. Satispay Europe SA 15. SIX BBS on behalf of the Swiss Banking Community 16. Spanish Banking Community 17. Swedish Banker's Association
Other stakeholders	<ol style="list-style-type: none"> 1. equensWorldline 2. Form3, Back Office Technology Limited 3. Oracle Software