EPC Guidance Document

Use of Structured Address under the SEPA Payment Schemes as of November 2025

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0 Document Information

Issue number	Dated	Reason for revision
V1.0	25/10/2022	Reviewed and approved by the October 2022 Scheme Management Board (SMB) meeting

1 Aim of document

The guidance document is addressed to Payment Service Users (PSUs) using ISO 20022 standard-based XML payment messages to initiate SEPA Credit Transfer (SCT), SEPA Instant Credit Transfer (SCT Inst), SEPA Direct Debit (SDD) Core and SDD Business-to-Business (B2B) in the Customer-to-Payment Service Provider (PSP) space, and to SEPA payment scheme participants sending and/or receiving such payment messages in the Inter-PSP space.

The document determines the concrete impact of the exclusive use of structured addresses as of the November 2025 entry-into-force date of the SEPA payment scheme rulebooks on the various SEPA payment scheme processes for the PSUs and the SEPA payment scheme participants concerned.

It also gives guidance to PSUs and SEPA payment scheme participants on how they can deal with the SEPA payment initiation, acceptance and processing aspects affected by the change-over to structured addresses.

The EPC may update this guidance document from time to time based on further clarification requests from PSUs and SEPA payment scheme participants. It may also issue other communication material where relevant for PSUs and SEPA payment scheme participants on how a structured address in a SEPA payment transaction should be submitted and treated as of 23 November 2025.

2 Concrete structured address set-up

During the transition period up to 23 November 2025 in which PSUs and scheme participants can start to move to the use of structured addresses, the current input of addresses with 2 occurrences of the unstructured address element "Address Line" associated with the structured address element "Country" will still be accepted.

The provision of structured addresses for SEPA payments must comply with following requirements:

- Data element "Address Line" **cannot be used**
- Data elements "Country" *<Ctry>* and "Town Name" *<TwnNm>* **must be used**
- All other 12 data elements may be used depending on the components of the address.

The SWIFT Payment Market Practice Group (PMPG) gives guidance for the provision of the ISO 20022 data element "Postal Address" based on the practices of each country across the globe. It maintains a "SWIFT ISO20022 Structure Postal Address" document on the SWIFT PMPG website. This document gives a detailed insight into each country's use of the structured Postal Address components.

Illustration of unstructured vs. structured address data (example for SCT transaction):

Unstructured address	Structured address
<Dbtr> <Nm>PETRA DUPONT</Nm> <PstlAdr> <AdrLine> CITY HALL GROTE MARKT 1</AdrLine> <AdrLine>1000 BRUSSELS</AdrLine> <Ctry>BE</Ctry> <PstlAdr> <Dbtr>	<Dbtr> <Nm>PETRA DUPONT</Nm> <PstlAdr> <StrtNm>GROTE MARKT</StrtNm> <BldgNb>1</BldgNb> <BldgNm>CITY HALL</BldgNm> <PstlCd>1000</PstlCd> <TwnNm>BRUSSELS</TwnNm> <Ctry>BE</Ctry> <PstlAdr> <Dbtr>

3   Structured address only as of 23 November 2025

At the end of the 2022 SEPA payment scheme rulebook change management cycle, the EPC decided to allow only the structured address of the PSU in ISO 20022 standard-based XML payment messages within the Customer-to-PSP space and within the Inter-PSP space, for all SEPA payment schemes as of the November 2025 entry-into-force date of the SEPA payment scheme rulebooks.

3.1   From 19 November 2023 to 23 November 2025

During this period, **PSUs** are **allowed** 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
- Of 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 on at least the relevant EPC Customer-to-PSP Implementation Guidelines (IGs) for SCT and SDD transactions. These IGs define the rules to be applied to the **ISO 20022 standard-based XML payment messages** for the implementation of SCT and SDD transactions in the Customer-to-PSP space.

As of 19 November 2023, also **SEPA payment scheme participants** are **allowed** to provide structured addresses in their Inter-PSP ISO 20022 standard-based XML SEPA payment messages and any related r-transaction messages where applicable.

In practice, **all SEPA payment scheme participants** concerned **must support the acceptance and the delivery of structured addresses** when PSUs and other scheme participants want to have a structured address in their outgoing and incoming SEPA payment transactions. From 19 November 2023 onwards, the SEPA payment scheme participants concerned 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 23 November 2025.

3.2   As of 23 November 2025

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 PSUs when they send electronic Customer-to-PSP files based on ISO 20022 standard-based XML payment messages in accordance with at least the relevant EPC Customer-to-PSP IGs of the SEPA payment schemes concerned. The use of an **unstructured** address will **no longer be allowed and will hence lead to rejects**.

3.3   Reasons for a phased approach

The phased approach for PSUs to move to the exclusive use of structured addresses as of 23 November 2025 is based on the following grounds:

- Such change requires analyses of and possible changes in multiple SEPA payment and non-payment related applications and/or customer data databases at the (corporate) PSUs.
- Allow the (corporate) PSUs to align the implementation of this change for SEPA payments with the changes they must do for the migration of the SWIFT MT messages to ISO 20022 standard-based XML messages following the Cross-border Payments and Reporting Plus (CBPR+) specifications by November 2025.

3.4   Added value of structured address

With the exclusive use of structured addresses as of the November 2025 entry-into-force date of all SEPA payment scheme rulebooks, the SEPA payment schemes will be aligned with the deadline set for the use of the structured address under the CBPR+ specifications.

The CBPR+ specifications define how the ISO 20022 standard for XML messages must be used for cross-border payments and cash reporting via the SWIFT network. The SWIFT community decided to move cross-border and correspondent banking payments 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 further reduce errors in payment processing and to improve regulatory screening and reconciliation. As a result, this will increase the straight-through-processing of SEPA payment transactions.

4   Impact analysis and EPC guidance

4.1   Applicable legislative framework – SEPA payment scheme rulebook specifications

The Regulation 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006 (Funds Transfer Regulation 2 (FTR2))[1] specifies among others that the full address of the payer (i.e. an SCT (Inst) Originator and a SDD Debtor) needs to be provided in the SEPA payment message when the Originator PSP/Debtor PSP or the Beneficiary PSP/Creditor PSP is based in a SEPA country that is not part of the European Economic Area (EEA).

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[1] Some amendments to the Regulation 2015/847 were made via the Regulation 2019/2175 of 18/12/2019.

For SEPA payment messages sent between PSPs whereby both the Originator PSP/Debtor PSP and the Beneficiary PSP/Creditor PSP are based in an EEA SEPA country, the provision of the address of the payer is optional under the SEPA payment schemes. However, even in such intra-EEA payment cases, the PSU sending the SEPA payment message may well decide to provide address details about the payer.

Furthermore, the PSU sending a SEPA payment message may also include the address of the payee although this data element is optional under the SEPA payment schemes.

4.2   PSUs using ISO 20022 standard-based XML payment initiation messages

The change to the rulebooks reported under section 3 applies only to SCT (Inst) and SDD transactions initiated via ISO 20022 standard-based XML pain. messages (i.e. pain.001 for SCT (Inst) and pain.008 for SDD) in accordance with at least the relevant EPC Customer-to-PSP IGs of the SEPA payment schemes concerned.

4.2.1   SCT (Inst) Instructions

When the Originator PSP or the Beneficiary PSP is based in a SEPA country that is not part of the European Economic Area (EEA), the address of the Originator must be provided for further transmission into the Inter-PSP space to the Beneficiary PSP.

The Originator can submit itself its address in SCT (Inst) Instructions even though the Originator PSP already possesses the full address details of the Originator in its customer 'static data' repositories. The Originator PSP has obtained this address through another independently verified source.

The Originator PSP may well overwrite the provided Originator address with the address of that Originator stored in its own customer 'static data' repositories, in the subsequent Inter-PSP pacs.008 message. The stored Originator address in such repositories may not be structured.

The Originator itself may provide the Originator PSP with SCT (Inst) Instructions containing the address of the Beneficiary even though such address is optional under the SCT (Inst) rulebook. The Originator may submit the Beneficiary address in a structured format or in an unstructured format. The Originator PSP submits the Beneficiary address as provided by the Originator (i.e. without any alternation) in the subsequent Inter-PSP pacs.008 message.

> **Guidance:**
>
> **From 19 November 2023 to 23 November 2025**
>
> **Originators** who wish to include the <u>Beneficiary address</u> in SCT (Inst) Instructions, are free to transmit the Beneficiary address in a structured or unstructured format.
>
> Those Originators who include a Beneficiary address in their pain.001 messages and still prefer sending an unstructured Beneficiary address during this period, must start upgrading their Beneficiary 'static data' repositories so that these repositories can store structured Beneficiary addresses latest by 23 November 2025.
>
> The Originators concerned must also start upgrading their payment and payment-related systems/applications to initiate SCT (Inst) Instructions so that these systems/applications can insert a structured Beneficiary address by 23 November 2025.

For SCT (Inst) Instructions requiring <u>the Originator address</u> and the Originator itself does not submit its own address, the **Originator PSP** is free to transmit the address of the Originator in a structured or unstructured format in the subsequent Inter-PSP pacs.008 message to the Beneficiary PSP.

Those Originator PSPs who still prefer sending an unstructured Originator address during this period, must start upgrading their Originator 'static data' repositories so that these repositories can store structured Originator addresses latest by 23 November 2025.

As of 19 November 2023

The **Originator PSP** must be able to accept and execute Customer-to-PSP pain.001 messages containing structured Originator and/or Beneficiary addresses.

The Originator PSP can still opt to submit the <u>Originator address</u> in the Inter-PSP pacs.008 message as stored in its customer 'static data' repositories, even if the stored Originator address is still not structured. The Originator PSP must be able to deliver Inter-PSP pacs.008 messages with a structured <u>Beneficiary address</u> to the Beneficiary PSP if delivered as such by the Originator.

The **Beneficiary PSP** must be able to accept, execute and settle SCT (Inst) Transactions containing structured Originator and/or Beneficiary addresses.

Entry-into-force date of the November 2025 SCT (Inst) scheme rulebook

For all SCT (Inst) Instructions in pain.001 messages to be executed or settled as of 23 November 2025 and containing Originator and/or Beneficiary addresses, the concerned address(es) in these Instructions must be structured. If not, the Originator PSP must reject the SCT (Inst) Instructions concerned.

For SCT (Inst) Instructions requiring the address of the Originator and the Originator itself does not submit its own address, the Originator PSP can only include a structured Originator address in the subsequent Inter-PSP pacs.008 message to the Beneficiary PSP.

The other Inter-PSP space actors and/or the Beneficiary PSP must reject/return all SCT (Inst) Transactions to be executed or settled as of 23 November 2025 when such Transactions contain an unstructured address of the Originator and/or of the Beneficiary.

4.2.2 SDD Collections

When the Creditor PSP or the Debtor PSP is based in a SEPA country that is not part of the European Economic Area (EEA), the address of the Debtor must be provided for further transmission into the Inter-PSP space to the Debtor PSP and ultimately the Debtor itself.

The Creditor itself may also decide to provide the Creditor PSP with:

- **Debtor addresses** for SDD Collections whereby both the Creditor PSP and the Debtor PSP are based in an EEA SEPA country although a Debtor address is optional in such SDD Collections under the SDD rulebooks. The Creditor may submit the Debtor addresses in a structured or in an unstructured format.

- The **Creditor address** even though a Creditor address is optional under the SDD rulebooks. The Creditor can submit its own address in a structured or in an unstructured format even though the Creditor PSP already possesses the full address details of the Creditor in its

customer 'static data' repositories. The Creditor PSP has obtained this address through another independently verified source.

The Creditor PSP may well overwrite the provided Creditor address with the address of that Creditor stored in its own customer 'static data' repositories, in the subsequent Inter-PSP pacs.003 message. The stored Creditor address in such repositories may not be structured.

The Creditor PSP may not possess the address details of the Debtor in its customer 'static data' repositories as the Debtor concerned may hold its payment account at another PSP. The Creditor PSP thus fully relies on the quality and the structure of the Debtor address data given by the Creditor in the Customer-to-PSPs pain.008 message. The Creditor PSP submits the Debtor address as provided by the Creditor (i.e. without any alternation) in the subsequent Inter-PSP pacs.003 message.

Guidance:

From 19 November 2023 to 23 November 2025

For SDD Collections containing the address of the Debtor and/or of the Creditor itself, **Creditors** are free to transmit such Debtor and/or Creditor address in a structured or unstructured format in the Customer-to-PSP pain.008 message to the Creditor PSP.

Those Creditors who still prefer sending unstructured Debtor addresses during this period, must start upgrading their Debtor 'static data' repositories so that these repositories can store structured Debtor addresses latest by 23 November 2025.

The Creditors concerned must also start upgrading their payment and payment-related systems/applications to initiate SDD Collections so that these systems/applications can insert a structured Debtor address and/or Creditor address latest by 23 November 2025.

As of 19 November 2023

The **Creditor PSP** must be able to accept and execute Customer-to-PSP pain.008 messages containing structured Debtor and/or Creditor addresses.

The Creditor PSP can still opt to submit the Creditor address in the pacs.003 message as stored in its customer 'static data' repositories, even if such stored Creditor address is still not structured. The Creditor PSP must be able to deliver Inter-PSP pacs.008 messages with a structured Debtor address to the Debtor PSP if delivered as such by the Creditor.

The **Debtor PSP** must be able to accept, execute and settle SDD Collections containing structured Debtor and/or Creditor addresses.

Entry-into-force date of the November 2025 SDD scheme rulebooks

For all SDD Collections in pain.008 messages to be executed or settled as of 23 November 2025 and containing Debtor and/or Creditor addresses, the concerned address(es) in these Collections must be structured. If not, the Creditor PSP must reject the SDD Collections concerned.

The other Inter-PSP space actors and/or the Debtor PSP must reject/return all SDD Collections to be executed or settled as of 23 November 2025 when such Collections contain an unstructured address of the Debtor and/or of the Creditor.

4.3 PSUs using other payment initiation channels

PSUs may use other channels to initiate SCT and SDD transactions e.g., in a paper-based form, on a physical support (e.g., electronic optical or magnetic data carriers) or in another electronic channel (e.g., transactions initiated on an item-per-item basis via a mobile banking/PC web-banking application).

In this case, the Originator PSP/Creditor PSP must ensure that the address details about the Originator and/or the Beneficiary/ about the Debtor and/or the Creditor which the Originator/ Creditor must or wants to submit, will be inserted in the ISO 20022 standard-based pacs messages in the Inter-PSP space.

> **Guidance:**
>
> For all SCT and SDD transactions to be executed or settled as of 23 November 2025 and containing an address of the Originator and/or Beneficiary (for SCT (Inst)), of the Debtor and/or the Creditor (for SDD), the Originator PSP/Creditor PSP can only transmit these transactions to the next Inter-PSP party when they contain a structured Originator and/or Beneficiary address, or a structured Debtor and/or Creditor address.
>
> For these other channels latest by 23 November 2025, the **Originator PSP/Creditor PSP** must have processes in place to obtain address details (to be) given by the Originator/ Creditor, in a structured format as defined under section 2.

4.4 Payment files sent by PSUs before the entry-into-force date of the November 2025 rulebooks but to be executed as of that 2025 entry-into-force date

Originators and Creditors may submit respectively pain.001 and pain.008 payment files days or even weeks before the entry-into-force date of the November 2025 SEPA payment scheme rulebooks, but which must be executed as of that November 2025 entry-into-force date. Such initial files may have been submitted with an unstructured address of the Originator, the Beneficiary, the Debtor or the Creditor.

> **Guidance:**
>
> Firstly, the Originator PSPs and Creditor PSPs must inform and regularly remind their PSUs concerned well in advance about the upcoming address structure changes, to allow these PSUs to change the relevant address information in SCT (Inst) and SDD payments having an execution date as of 23 November 2025.
>
> Secondly, the Customer-to-sending PSP space lies in the commercial space and hence is subject to an agreement between both parties. It is up to each Originator PSP/Creditor PSP how to handle such specific pain. files on a case-by-case basis with each PSU concerned. The Originator PSP/Creditor PSP should make internal checks on SCT (Inst)/SDD payments with an execution date as of 23 November 2025 registered in their payment transaction warehouses (e.g., for SCT standing orders, SDD Collection files sent 14 calendar days before due date).
>
> These PSPs bear the responsibility that the addresses provided in such files are in accordance with the address structure requirements applicable as of the execution date of such pain. files and irrespective of the date of receipt of these files.

4.5 Payment files sent by <u>Originator PSPs and Creditor PSPs</u> before the entry-into-force date of the November 2025 rulebooks but to be executed as of that 2025 entry-into-force date

Originator PSPs and Creditor PSPs may submit respectively pacs.008 and pacs.003 payment messages to the next party in the Inter-PSP space, some days before the entry-into-force date (and time for SCT Inst) of the November 2025 SEPA payment scheme rulebooks with an execution date (and time for SCT Inst) as of that November 2025 entry-into-force date.

SCT (Inst) and SDD transactions in these files may contain unstructured addresses of the Originator, the Beneficiary, the Creditor and/or of the Debtor.

> **<u>Guidance:</u>**
>
> In the Inter-PSP space:
>
> - The exchange of the respective pacs.008 and pacs.003 files between the sending PSP and its CSM must follow the rules and possible technical offers of that CSM.
>
> - In any case, for SCT (Inst) Transactions/SDD Collections to be executed or settled as of 23 November 2025 and containing address details, the Beneficiary PSP/Debtor PSP will only accept, execute and settle such transactions when all provided addresses are structured. The presence of an unstructured address in such transaction will lead to a reject/return of that transaction.

4.6 Customer-to-PSP R-transactions to be executed as of the entry-into-force date of the November 2025 rulebooks

The following ISO 20022 standard-based XML messages can be exchanged to report R-transactions in the Customer-to-PSP space:

Customer-to-PSP space		
	Initial payment initiation message	**R-transaction to initial payment initiation message**
SCT	pain.001	pain.002 (Reject)
SCT Inst		pain.002 (Reject; Negative Confirmation; Positive Confirmation)
SDD Core	pain.008	• pain.002 (Reject)
SDD B2B		• pain.007 (Reversal sent by the Creditor)

The message **pain.002** is sent by the Originator PSP/Creditor PSP itself and reports an issue with the initial SCT (Inst) pain.001/SDD pain.008 instruction message detected by the Originator PSP/ Creditor PSP itself or by another Inter-PSP space actor.

The message **pain.007** is sent by the SDD Creditor itself and transports the Customer-to-PSP Reversal Instruction for a Collection sent earlier by the Creditor to the Creditor PSP.

The EPC specifications for using the pain.002 and pain.007 do not require concrete attributes about the address of the payer (SCT (Inst) Originator/ SDD Debtor) or of the payee (SCT (Inst) Beneficiary / SDD Creditor).

The pain.002 and pain.007 must contain an exact copy of all attributes of the initial payment initiation message. This copy may contain an unstructured address of the payer and/or of the payee in case this initial initiation message was sent or already processed before the entry-into-force date of the November 2025 rulebooks.

However, the possible presence of unstructured address data of the payer and/or of the payee is only of secondary value in these specific exception handling circumstances. Any unstructured address data by itself cannot block the further processing of these R-transaction types as of the entry-into-force date of the November 2025 rulebooks.

4.7 Inter-PSP R-transactions to be executed as of the entry-into-force date of the November 2025 rulebooks

The following ISO 20022 standard-based XML messages can be exchanged for R-transaction processing in the Inter-PSP space:

Inter-PSP space		
	Payment message	**R-transaction to payment message**
SCT	pacs.008	• pacs.002 (Reject) • camt.056 (Recall; Request for Recall by the Originator (RFRO)) • camt.027 (SCT Inquiry for Claim of Non-Receipt) • camt.087 (SCT Inquiry for Value Date Correction) • camt.029 (Negative Response to a Recall, RFRO or the two SCT Inquiry use cases; Positive Response to the two SCT Inquiry use cases) • pacs.004 (Return; Positive Response to a Recall or RFRO) • pacs.028 (Request for Status Update on a Recall, RFRO or the two SCT Inquiry use cases) • pacs.008 (Inter-PSP fee payment for the SCT Inquiry for Claim of Non-Receipt; Inter-PSP fee and/or compensation payment for the SCT Inquiry for Value Date Correction)
SCT Inst	pacs.008	• pacs.002 (Negative Confirmation; Positive Confirmation) • camt.056 (Recall; RFRO) • camt.029 (Negative Response to a Recall or an RFRO) • pacs.004 (Positive Response to a Recall or an RFRO) • pacs.028 (Request for Status Update on a Recall or an RFRO; SCT Inst Transaction Status Investigation)
SDD Core	pacs.003	• pacs.002 (Reject) • pacs.004 (Return; Refund) • pacs.007 (Reversal)
SDD B2B	pacs.003	• pacs.002 (Reject) • pacs.004 (Return) • pacs.007 (Reversal)

The EPC specifications for using the pacs. messages and camt. messages to send, to respond to or to request a status update about an earlier sent R-transaction message, do not require concrete attributes about the address of the payer (SCT (Inst) Originator/SDD Debtor) or of the payee (SCT (Inst) Beneficiary/SDD Creditor).

The pacs. messages and camt. messages must contain an exact copy of all attributes of the initial Inter-PSP SCT (Inst) payment/SDD collection message. This copy may contain an unstructured address of the payer and/or of the payee in case this initial Inter-PSP payment/collection message was sent or already processed before the entry-into-force date of the November 2025 rulebooks.

However, the possible presence of unstructured address data of the payer and/or of the payee is only of secondary value in these specific exception handling circumstances. Any unstructured address data by itself cannot block the further processing of these R-transaction types as of the entry-into-force date of the November 2025 rulebooks.