

SEPA Direct Debit Core Scheme Rulebook Public Consultation on 2024 Change Requests



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Public Consultation on 2024 Change Requests for SDD Core Scheme Rulebook

EPC008-24 Version 1.0

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

This SDD Core 2024 Change Request Public Consultation Document (document EPC008-24) details change requests for possible modifications to be introduced into the next version of the SDD Core scheme rulebook. This public consultation document builds on change requests submitted by stakeholder representatives, banking communities and by EPC Working and Support Groups. The SDD Core 2024 Change Request Public Consultation Document offers the analyses and recommendations of the EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG) on the way forward regarding individual change requests. A summary overview of the change requests and related recommendations by the PSEMWG is provided in section 1 of this Change Request Public Consultation Document.

The EPC submits the SDD Core 2024 Change Request Public Consultation Document for public consultation. The public consultation takes place between 12 March and 09 June 2024.

All scheme participants and stakeholders are encouraged to provide feedback on the possible changes to be introduced into the next version of the SDD Core scheme rulebook by completing the response template EPC013-24 and send it to change-request.EPC-scheme@epc-cep.eu by 09 June 2024 at 17h00 CET at the latest. The EPC will not consider any feedback received after this deadline.

Proposed changes detailed in this SDD Core 2024 Change Request Public Consultation Document, which are broadly accepted by all scheme participants and stakeholders, and that are technically and legally feasible, will be taken forward, after approval by the Payment Scheme Management Board (the EPC decision-making body in charge of the schemes' administration and evolution). Others will not be retained. The updated version of the SDD Core scheme rulebook will be published in November 2024 for implementation in November 2025. In accordance with industry best practice, payment service providers and their suppliers have an 12 months lead time to address scheme rulebook updates prior to such updates taking effect.

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

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

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

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

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

1.1. EPC Approach

The principles governing the evolution of the EPC payment schemes as set out in the SEPA Credit Transfer (SCT), SEPA Direct Debit (SDD) and the One-Leg Out Instant Credit Transfer (OCT Inst) scheme rulebooks are detailed in the 'EPC Payment Scheme Management Rules' (the Internal Rules). These Internal Rules are available for download on the European Payments Council (EPC) Website. Sections 5, 6 and 7 in this SDD Core 2024 Change Request Public Consultation Document detail the application of the Internal Rules in the EPC payment scheme change management process.

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

This executive summary of the SDD Core 2024 Change Request Public Consultation Document highlights change requests for major changes to the SDD Core scheme rulebook received in this scheme change management cycle. Change requests for minor changes to the SDD Core scheme rulebook are set out in section 4 of this Change Request Public Consultation Document. All change requests to the SDD Core scheme rulebook are submitted for public consultation between 12 March and 09 June 2024. Information on how to share feedback with the EPC is included on the cover page of this Change Request Public Consultation Document.

The EPC received **7** change requests for major changes to be introduced into the SDD Core scheme rulebook. The change requests submitted to the EPC are included in Annex 1 to this document.

Some change requests suggest amendments to the provision of the type of addresses under the SDD Core scheme as of November 2025. Currently, the 2023 SDD Core scheme rulebook specifies that as of November 2025, in case an address is provided, that address must be structured. There are change requests proposing the introduction of a hybrid address as of November 2025 besides the possibility of continuing to use the unstructured address (until November 2026) or the structured address.

Several change requests suggest extending the character length of the name field of the Creditor, Debtor and their respective reference parties from 70 to 140 characters. There are also suggestions to introduce attributes for the commercial trade names of the Creditor and of the Creditor Reference Party, and for the address of the Reference Party of the Creditor and of the Debtor.

A final change request demands to extend the period for submitting a SDD Reversal.

All change requests to the SDD Core scheme rulebook received were reviewed by the EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG). These change requests include the recommendation of the PSEMWG regarding each of these change requests unless the PSEMWG is not able to provide a recommendation for the public consultation. Each recommendation reflects one of the options detailed in items a) through f) below:

- a) The change request is already provided for in the scheme: no action is necessary for the EPC.
- b) The change request **should be incorporated into the scheme**: the change request would become part of the scheme and the rulebook would be amended accordingly.
- c) The change request should be included in the scheme as an **optional feature**:
 - The new feature is optional and the rulebook would be amended accordingly;

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- 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;
 - o It is demonstrated that enough stakeholders will make use of the new scheme;
 - A cost-benefit analysis is provided;
 - o It complies with the SEPA Regulation or any other relevant Regulation.

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

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

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

In case the contributors do not agree with the PSEMWG recommendation, they are requested to indicate in the comments section of the response template EPC013-24 their preferred way forward (e.g., support of the original change request, selecting another option).

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

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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



Change Request item	Topic	Contributor	Recommendation of the PSEMWG on the proposed way forward. The final decision is subject to the outcome of the public consultation.
06	Introduction of Hybrid Address of the Payment End-User	OLO TF and PSEMWG	Should be incorporated into the scheme - option b
08	Extension of Time Limit for initiating a SDD Reversal	French banking community	Cannot be part of the existing scheme - option e
11	Extension of Character Length for Name	OLO TF and PSEMWG	Should be incorporated into the scheme - option b
12	Inclusion of Commercial Trade Name	PSEMWG	Should be incorporated into the scheme - option b
13	Inclusion of Reference Party Address	PSEMWG	Should be incorporated into the scheme - option b
16	Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	Swiss banking community	Cannot be part of the existing scheme - option e
17	Extension of Character Length for Name	Swiss banking community	Should be incorporated into the scheme - option b

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

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

Ref.	Торіс	Contributor	Way forward	
	At this point in time, no items have been identified that require a change to the SDD Core scheme rulebook due to any EU legislation.			

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

2.1. # 06: Introduction of Hybrid Address of the Payment End-User

2.1.1. Description

This change request was made by the OLO TF and the PSEMWG.

Past EPC decision

The March 2022 EPC Scheme Management Board (SMB) meeting approved the 2022 change request item #06 to exclusively use the structured address of the customer as of November 2025. This change would affect all four SEPA payment scheme rulebooks.

As of 19 November 2023³, customers would be allowed to send in a structured way their own address and/or the address of their payment counterparty in electronic Customer-to-PSP files at least when based on the corresponding EPC payment scheme Customer-to-PSP IGs.

One element the EPC took into account for its decision was that with the exclusive use of structured addresses as of November 2025, the SEPA payment schemes would be aligned with the deadline set for the use of the structured address under the Cross-border Payments and Reporting Plus (CBPR+) and High Value Payments Plus (HVPS+) usage guidelines.

When the OCT Inst scheme rulebook was published in 2023, it also included the exclusive use of a structured address as of November 2025.

Developments within SWIFT

The December 2023 SWIFT Board meeting decided to adapt its address specifications for the SWIFT Standard Release 2025. SWIFT decided to

- Step back from its initial decision to allow only structured addresses as of November 2025;
- introduce a **hybrid address** version by November 2025 alongside a structured address version with the hybrid address version having no expiration date; and
- Allow the unstructured address version until November 2026 (22 November 2026).

The **hybrid address** concerns a mix of structured and unstructured address details. It allows the combination of structured ISO 20022 address elements <u>and</u> up to <u>two</u> lines of 70 characters of unstructured "Address Line" <AdrLine>. Elements available in structured format must be mapped into the respective structured elements. The structured elements for "Country" <Ctry> and for "Town Name" <TwnNm> will become mandatory. Structured elements cannot be repeated in the <AdrLine> elements.

Re-consideration of earlier EPC decision

The EPC Payment Scheme Management Board (PSMB) re-considered the EPC decision taken back in March 2022. It is now in favour of the introduction of the hybrid address alongside the structured and the unstructured addresses in all five EPC payment schemes having in mind the following elements:

 A migration from unstructured addresses directly to fully structured addresses is a true challenge for payment end users and PSPs, especially given the current deadline of November 2025 for SEPA transactions. The time needed to change the addresses in all customer databases or to move to databases capable of supporting structured addresses, would be long.

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³ This date was later postponed to 17 March 2024 due to the EPC decision on 24 October 2023 to postpone the ISO version migration for all four 2023 SEPA payment scheme rulebooks to 17 March 2024.

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- For customers making SEPA, high value and international payment transactions, an alignment of the address structure between the three groups of payment instruments would be the best;
- Only the structured address fields 'Town' and 'Country' are needed for regulatory screening.

2.1.2. PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025** as follows:

- 1. Since the 2023 SEPA payment scheme rulebooks, payment end users and payment scheme participants are already allowed to provide <u>fully structured</u> addresses in their respective electronic Customer-to-PSP files and inter-PSP payment messages and r-transactions.
 - The provision of fully structured addresses remains supported under the 2025 SEPA payment scheme rulebooks as well.
 - This means that all scheme participants must continue 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. Scheme participants cannot reject SEPA payment transactions only due to the inclusion of a structured address.
- 2. As of the entry-into-force date of the 2025 SEPA payment scheme rulebooks being 16 November 2025, payment end users are allowed to send a **hybrid address** of the payer and/or of the payee in electronic Customer-to-PSP files at least based on the Customer-to-PSP Implementation Guidelines for SEPA payment transactions.
 - From that same date, also SEPA payment scheme participants are allowed to provide hybrid addresses in their inter-PSP SEPA payment messages and r-transactions.
 - As of 16 November 2025, all scheme participants must also be able to support the delivery of hybrid addresses when payment end users and scheme participants want a hybrid address in their outgoing and incoming SEPA payment transactions. From this date, scheme participants cannot reject SEPA payment transactions only due to the inclusion of a hybrid address.
- 3. As of the entry-into-force date of the 2025 SEPA payment scheme rulebooks being 16 November 2025 up to 22 November 2026, payment end users and scheme participants are allowed to continue providing <u>unstructured</u> addresses in their respective electronic Customer-to-PSP files and inter-PSP SEPA payment messages and r-transactions.
 - In the period November 2025 November 2026, all scheme participants must continue to support the delivery of unstructured addresses when payment end users and scheme participants want an unstructured address in their outgoing and incoming SEPA payment transactions. Scheme participants cannot reject SEPA payment transactions only due to the inclusion of an unstructured address.

As of 22 November 2026, the use of an **unstructured** address will **no longer be allowed and will hence lead to rejects**. Only hybrid and structured addresses will be allowed from that date onwards.

The EPC nevertheless recommends that scheme participants and their customers to use the time up to November 2026 in which unstructured addresses can still be submitted (compared to initially November 2025), as an opportunity to start right away with the switch from unstructured addresses directly to fully structured addresses.

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The use of structured addresses in 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.

During the transition period up to November 2026 in which payment end users and scheme participants can start to move to the use of hybrid or preferably 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 continue to be accepted.

2.1.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.

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2.2. # 08: Extension of Time Limit for initiating a SDD Reversal

2.2.1. Description

This change request was made by the French Banking Federation.

The current timespan to send a reversal is 5 inter-PSP Business Days after the settlement date. The contributor suggests extending the timespan from 5 to 10 inter-PSP Business Days. It would avoid:

- Asking the Debtor PSP to initiate a Refund when the 5 inter-PSP Business days timespan is over;
- Agreeing on the sending of a credit transfer from the Creditors (or their PSPs) to the Debtors to cancel the initial SDD collections.

The contributor understands that extending the current timespan to 10 days can cause conflicts with other r-transaction types being exchanged at the same time for the same SDD collection.

However, the contributor is of the view that this drawback is largely outbalanced by the benefit of extending the STP-driven Reversal process time span (e.g., less expensive and easier to handle than a manual procedure). It can be mitigated by the launch of a coordinated plan between the concerned PSPs as soon as the incident is detected.

2.2.2. PSEMWG analysis and recommendation

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

There is no demand from PSPs or from Creditors to extend this period. The need to do a Reversal is due to an error by the Creditor. 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).

Allowing a longer timespan for Reversals will cause conflicts with other SDD r-transaction types. This will lead to new credit risks for the Creditor. The Debtor will very likely claim a Refund for an unauthorised collection.

2.2.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.

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2.3. # 11: Extension of Character Length for Name

2.3.1. Description

This change request was made by the OLO TF and the PSEMWG.

The SEPA length of characters is currently set at 70 characters for the <u>name fields</u> for the following attributes under the SCT Inst scheme rulebook: Originator (AT-P001), Originator Reference Party (AT-P006), Beneficiary (AT-E001) and Beneficiary Reference Party (AT-E007).

It suggests extending the character length for the 'Name' field for the SCT Inst scheme **for all upper-mentioned attributes** from 70 to 140 characters as:

- The 2019 ISO 20022 standard foresees up to 140 characters for the 'Debtor', 'Ultimate Debtor', 'Creditor', 'Ultimate Creditor' and 'Financial Institution' name fields.
- The provision of extra characters allows payment service users to enter the complete name(s) concerned. This avoids the issue of data truncation and can provide the payment service user with further transparency about the identity of the payment counterparty and/or its reference parties and the financial institution(s) involved.
- The possibility to provide the complete name(s) can support PSPs with respect to regulatory screening.
- The Cross-border Payments and Reporting Plus (CBPR+) specifications also allow 140 characters for these name fields.

This proposed change does not impact the SCT Inst scheme rulebook itself, but only its related Customer-to-PSP and inter-PSP implementation guidelines.

Important: if the 2024 change request item #12 (see section 2.11 in this document) on the inclusion of the commercial trade name would be supported, the maximum length of the commercial trade name could become 140 characters as well (depending on the final message element selected to transport the commercial trade name).

2.3.2. PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**.

2.3.3. Rulebook impact

If this change request is supported, this will only impact the Customer-to-PSP and the inter-PSP implementation guidelines.

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2.4. # 12: Inclusion of Commercial Trade Name

2.4.1. Description

This change request was made by the PSEMWG.

The <u>Statement</u> of the June 2021 Euro Retail Payments Board (ERPB) meeting endorsed a <u>set of recommendations</u> formulated by the ERPB working group on transparency for retail payment endusers.

One recommendation assigned to payment schemes such as the EPC payment schemes relates to the commercial trade name i.e. recommendation id 01: *Consistently use commercial trade name and provide this name to all involved parties in the payment chain for use in client's payment account statements*.

Furthermore, the commercial trade name is referred to in Article 25 'Information for the payer on individual payment transactions' of the proposed Payment Services Regulation (PSR), and in Article 2 (1c) of the amended SEPA Regulation.

The PSEMWG analysed to what extent the existing EPC payment scheme attributes suffice to meet the identified need or whether additional attributes would be needed.

Following this analysis, new attributes related to the "whom" are proposed being **yellow optional** fields in the relevant payment scheme implementation guidelines. As a yellow optional field, all scheme participants must support this ISO message element throughout their SEPA payment systems even though payment service users would still be free to use these elements or not.

2.4.2. PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**.

2.4.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.

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2.5. # 13: Inclusion of Reference Party Address

2.5.1. Description

This change request was made by the PSEMWG.

The <u>Statement</u> of the June 2021 Euro Retail Payments Board (ERPB) meeting endorsed a <u>set of recommendations</u> formulated by the ERPB working group on transparency for retail payment endusers.

One aspect for which transparency can be improved is about the reference parties of the payer and of the payee.

The SEPA payment scheme rulebooks currently support only the exchange of the name and an identification code of such reference parties. The proposal is to also allow the exchange of the address of such reference parties. Payment end-users would no longer have to use other fields (such as the remittance information field) to provide such address data. It also allows better regulatory processing of such reference party data.

New attributes are proposed being **yellow optional** fields in the relevant payment scheme implementation guidelines. As a yellow optional field, all scheme participants must support this ISO message element throughout their SEPA payment systems even though payment service users would still be free to use this element or not.

Important: the proposed specifications to be followed to complete such addresses are aligned with the specifications proposed for the 2024 change request item #06 (see section 2.6 in this document).

Subject to the final decision by the Payment Scheme Management Board (PSMB) for item #06, the proposed address specifications for the reference parties may remain unchanged or may be adapted accordingly.

2.5.2. PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**.

2.5.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.

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2.6. # 16: Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space

2.6.1. Description

This change request was made by the Swiss banking community.

This change request is linked to the potential change of the implementation of the structured address. If the hybrid address is <u>not</u> introduced or another decision is taken in regards of the structured address (e.g., postponement to a later change cycle), this change request becomes obsolete.

Preliminary explanation:

Based on the section 0.5.1 'SCT Inst Scheme Implementation Guidelines', the implementation guidelines are binding in the Customer-to-PSP space. Most Swiss PSPs have already implemented the structured address based on the currently valid definition in their offering and internal applications. While in the inter-PSP space the handling of the address must be anyway less strict (e.g., supporting cross-border payments via SWIFT, bank-to-bank payments, cash-legs of other types of transaction), the rules in the Customer-to-PSP space are often implemented more restrictively.

<u>Change request in case the content of the address of the involved parties was changed from structured to hybrid:</u>

The hybrid address becomes only mandatory in the inter-PSP space. In the Customer-to-PSP space, the respective PSP is not obliged to support the hybrid address and can restrict its offering to structured address only.

2.6.2. PSEMWG analysis and recommendation

The PSEMWG recommends not taking forward the change request (**option e**). Reference is made to the change request item # 06 (see section 2.6 in this document) as submitted by the OLO TF and the PSEMWG.

The change request item # 06 allowing payment service users to submit hybrid addresses (if they wish so) as of November 2025, is an alignment with the SWIFT Standard Release 2025 for the Cross-border Payments and Reporting Plus (CBPR+) usage guidelines. The suggestion is to include this hybrid address possibility in the Customer-to-PSP Implementation Guidelines (IGs) which each Creditor PSP is obliged to support at the request of the Creditor. The section 0.5.1 of the rulebook points out that these IGs are **binding** supplements for the scheme participants.

2.6.3. Rulebook impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the inter-PSP implementation guidelines.

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2.7. # 17: Extension of Character Length for Name

2.7.1. Description

This change request was made by the Swiss banking community.

The contributor suggests extending the character length for the relevant 'Name' fields under the SCT Inst scheme, from 70 to 140 characters.

This proposed change does not impact the SCT Inst scheme rulebook itself, but only its related Customer-to-PSP and inter-PSP implementation guidelines.

2.7.2. PSEMWG analysis and recommendation

The PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2025**. This change request has the same goal as the change request item # 11 (see section 2.10 in this document).

2.7.3. Rulebook impact

If this change request is supported, this will only impact the Customer-to-PSP and the inter-PSP implementation guidelines.

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

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

For this release management cycle, no such changes have been deemed required at this point in time.

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

For this release management cycle, no minor changes have been raised at this point in time.

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5. Principles Governing the Change Management Cycle

5.1. Change Request Public Consultation Document

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

5.2. Structure of the Change Request Public Consultation Document

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

These change requests fall into three categories:

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

Annex 1 contains all received original change requests for the 2024 SDD Core scheme rulebook change management cycle.

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6. Change Management Cycle in respect of Major Change Requests

6.1. Consideration of Change Requests

In accordance with chapter 4.1.4 of the Internal Rules, a number of change requests with respect to the rulebooks have been submitted for consideration to the PSEMWG. 7 of these are applicable to the SDD Core scheme.

Following consideration of these change requests as required under chapter 4.1.6 of the Internal Rules, the PSEMWG has determined: (a) that the change requests set out in section 2 and 3 meet the criteria for acceptance into the 2024 SDD Core scheme rulebook change management cycle; and (b) that the change requests set out in section 4 constitute minor change requests invoking the procedures set out in Chapter 4.3 of the Internal Rules.

6.2. Change Request Public Consultation Document

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

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

6.3. PSEMWG Recommendations

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

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

6.4. Public Consultation on the Change Requests

The EPC encourages all SEPA stakeholders to provide feedback during the public consultation. PSP communities are asked to consult all their members who are involved in the SDD Core scheme to ensure that the views of the payment services constituency are considered in the public consultation process. The PSEMWG encourages the PSP communities to consult as wide a range of stakeholders as possible, including participants, end users and service suppliers. All stakeholders should provide feedback to the EPC on the Change Request Public Consultation Document by **09 June 2024 at 17h00 CET at the latest. The EPC will not consider any feedback received after this deadline.**

6.5. Next Steps

Considering the comments received during the public consultation, the PSEMWG will produce a Change Proposal Submission Document to the PSMB for decision-making purposes in accordance with section 4.2.5 of the Internal Rules, and to the EPC Stakeholder Fora (see section 4.4 of the Internal Rules) for their respective positions on the PSEMWG Change Proposals.

Approved change requests will be incorporated into the version 1.0 of the 2025 SDD Core scheme rulebook and published in November 2024 with the intention that they become effective in November 2025.

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Public Consultation – 2024 Change Requests SDD Core Scheme Rulebook

EPC008-24



6.6. Further Information

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

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7. Change Management Cycle in respect of Minor Change Requests

7.1. Publication of List of Minor Change Requests

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

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

7.2. Comments on the Minor Change Requests

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

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

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

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Annex 1 - Original Change Requests

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Template for Proposing a Change Request in an EPC Payment Scheme

EPC 164-21 Version 1.1 28 March 2023

CR #06

Public Approved Payments Council

European Payments Council AISBL

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Entreprise N°0873.268.927

secretariat@epc-cep.eu

European

Responses by e-mail to change-request.EPC-scheme@epc-cep.eu by 31 December 2023

Name of	Payment Scheme Evolution and Maintenance Working Group
contributor:	(PSEMWG) and One-Leg Out Task Force (OLO TF)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	#06 -All schemes-EPC-Introduction of Hybrid Address of the Payment End-
	User
Scheme and	Highlight which EPC Scheme Rulebook(s) this change request relates to:
document and	EPC125-05 2023 SEPA Credit Transfer Rulebook
version number:	EPC004-16 2023 SEPA Instant Credit Transfer Rulebook
	EPC016-06 2023 SEPA Direct Debit Core Rulebook
	EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook
	EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook
Request Date:	15 December 2023
For information:	This template is provided by EPC to allow any person or organisation to
	submit a change request for making a change to the EPC Payment Schemes
	in accordance with the rules set out in the document 'EPC Payment Scheme
	Management Rules' available on the <u>EPC Website</u> .

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1. General Description of the Change Request

1.1. Suggested launch date (if any):

16 November 2025 – effectiveness date of all five 2025 EPC payment scheme rulebooks.

1.2. Description of the change request:

Past EPC decision

The March 2022 EPC Scheme Management Board (SMB) meeting approved the 2022 change request item #06 to exclusively use the structured address of the customer as of November 2025. This change would affect all four SEPA payment scheme rulebooks.

As of 19 November 2023¹, customers would be allowed to send in a structured way their own address and/or the address of their payment counterparty in electronic Customer-to-PSP files at least when based on the corresponding EPC payment scheme Customer-to-PSP IGs.

As of 16 November 2025, the use of the structured address would become mandatory for payment service users when they would send electronic Customer-to-PSP files at least when based on the corresponding EPC payment scheme Customer-to-PSP IGs. From that date, the use of an unstructured address would no longer be allowed and would hence lead to rejects.

One element the EPC took into account for its decision was that with the exclusive use of structured addresses as of November 2025, the SEPA payment schemes would be aligned with the deadline set for the use of the structured address under the Cross-border Payments and Reporting Plus (CBPR+) and High Value Payments Plus (HVPS+) usage guidelines. These specifications define how ISO 20022 should be used for such payment messages on the SWIFT network. The SWIFT community decided to move from SWIFT MT messages to ISO 20022 standard-based XML messages by November 2025.

Developments within SWIFT

The December 2023 SWIFT Board meeting decided to adapt its address specifications for the SWIFT Standard Release 2025. SWIFT decided to

- Step back from its initial decision to allow only structured addresses as of November 2025;
- introduce a hybrid address version by November 2025 alongside a structured address version with the hybrid address version having no expiration date; and
- Allow the unstructured address version until November 2026 (22 November 2026).

The hybrid address concerns a mix of structured and unstructured address details. It allows the combination of structured ISO 20022 address elements <u>and</u> up to <u>two</u> lines of 70 characters of unstructured "Address Line" <AdrLine>. Elements available in structured format must be mapped into the respective structured elements. The structured elements for "Country" <Ctry> and for "Town Name" <TwnNm> will become mandatory. Structured elements cannot be repeated in the <AdrLine> elements.

The following two diagrams from the SWIFT advisory group Payments Market Practice Group (PMPG) give further details about the upcoming changes in the period November 2025 – November 2026 and the period beyond November 2026.

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¹ This date was later postponed to 17 March 2024 due to the EPC decision on 24 October 2023 to postpone the ISO version migration for all four 2023 SEPA payment scheme rulebooks to 17 March 2024.



Network

November 2025 - November 2026



Unstructured

- No combination with structured ISO20022 address elements allowed
- Difficulty to interpret data due to co-mingling of address elements



Hybrid In scope of PMPG CR

- Combination of structured ISO20022 address elements and up to 2 lines of 70 characters of unstructured "AdrLine" allowed
- Elements available in structured format must be mapped into the respective structured element (minimum: TownName & Country)
- Structured elements must not be repeated in the AdrLine element(s)



November 2026 Onwards Fully structured Unstructured **Hybrid** In scope of PMPG CR All available address data is o combination with Combination of structured ISO20022 address mapped into on of the 14 uctured ISO20022 addr elements and up to 2 lines of 70 characters ISO20022 fields ents allowed of unstructured "AdrLine" allowed validation No co-mingling of data Difficu ty to interpret data Elements available in structured format must due to p-mingling of address be mapped into the respective structured No combination with "AdrLine" element (minimum: TownName & Country) elements Structured elements must not be repeated in Textual the AdrLine element(s) <Nm>JOHN SMITH</Nm> HOOGSTRAAT 6, 18th floo TwnNm>BRUSSELS</TwnNm> Ctry>BE</Ctr drLine>HOOGSTRAAT 6, 18th floor</AdrLine> </PstlAdr> </Cdtr>

Re-consideration of earlier EPC decision

The EPC Payment Scheme Management Board (PSMB) re-considered the EPC decision taken back in March 2022. It is now in favour of the introduction of the hybrid address alongside the structured and the unstructured addresses in all five EPC payment schemes having in mind the following elements:

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- A migration from unstructured addresses directly to fully structured addresses is a true challenge for payment end users and PSPs, especially given the current deadline of November 2025 for SEPA transactions. The time needed to change the addresses in all customer databases or to move to databases capable of supporting structured addresses, would be long.
- For customers making SEPA, high value and international payment transactions, an alignment of the address structure between the three groups of payment instruments would be the best.
- To align the address specifications under the current 2023 One-Leg Out Instant Credit Transfer (OCT Inst) rulebook (which currently stipulate the exclusive use of structured addresses as of November 2025) with those of the SWIFT Standard Release 2025 for CBPR+ and HVPS+.
- Only the structured address fields 'Town' and 'Country' are needed for regulatory screening.

Suggestion to the EPC payment scheme rulebooks

- 1. Since the 2023 EPC payment scheme rulebooks, payment end users and EPC payment scheme participants are already allowed to provide <u>fully structured</u> addresses in their respective electronic Customer-to-PSP files and inter-PSP EPC payment messages and r-transactions.
 - The provision of fully structured addresses remains supported under the 2025 EPC payment scheme rulebooks as well.
 - This means that all scheme participants must continue to support the delivery of structured addresses when payment end users and scheme participants want a structured address in their outgoing and incoming EPC payment transactions. Scheme participants cannot reject EPC payment transactions only due to the inclusion of a structured address.
- 2. As of the entry-into-force date of the 2025 EPC payment scheme rulebooks being 16 November 2025, payment end users are allowed to send a **hybrid** address of the payer and/or of the payee in electronic Customer-to-PSP files at least based on the relevant EPC Customer-to-PSP Implementation Guidelines for SCT, SCT Inst, OCT Inst, SDD Core and SDD B2B transactions.
 - From that same date, also EPC payment scheme participants are allowed to provide hybrid addresses in their inter-PSP EPC payment messages and r-transactions.
 - As of 16 November 2025, all scheme participants must also be able to support the delivery of hybrid addresses when payment end users and scheme participants want a hybrid address in their outgoing and incoming EPC payment transactions. From this date, scheme participants cannot reject EPC payment transactions only due to the inclusion of a hybrid address.
- 3. As of the entry-into-force date of the 2025 EPC payment scheme rulebooks being 16 November 2025 up to 22 November 2026, payment end users and EPC payment scheme participants are allowed to continue providing <u>unstructured</u> addresses in their respective electronic Customerto-PSP files and inter-PSP EPC payment messages and r-transactions.
 - In the period November 2025 November 2026, all scheme participants must continue to support the delivery of unstructured addresses when payment end users and scheme participants want an unstructured address in their outgoing and incoming EPC payment transactions. Scheme participants cannot reject EPC payment transactions only due to the inclusion of an unstructured address.

As of 22 November 2026, the use of an **unstructured** address will **no longer be allowed and will hence lead to rejects**. Only hybrid and structured addresses will be allowed from that date onwards.

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The EPC nevertheless recommends that EPC scheme participants and their customers to use the time up to November 2026 in which unstructured addresses can still be submitted (compared to initially November 2025), as an opportunity to start right away with the switch from unstructured addresses directly to fully structured addresses.

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

During the transition period up to November 2026 in which payment end users and scheme participants can start to move to the use of hybrid or preferably 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 continue to be accepted.

Subject to the outcome of the public consultation on this change request and the final decision to be taken by the PSMB, the EPC will update the EPC document 'Guidance on the use of structured addresses under the SEPA payment schemes as of November 2025' (EPC 153-22) accordingly.

The provision of **hybrid** addresses in EPC payment transactions is based on the ISO 20022 "Postal Address" and must comply with following requirements:

- Mandatory use of the structured data elements "Country" and "Town Name";
- Up to two lines of the unstructured data element "Address Line" are allowed;
- Other structured address elements must be mapped into the respective other 12 structured data elements;
- Structured data elements cannot be repeated in the "Address Line" elements.

The provision of **structured** addresses in EPC payment transactions is also based on the ISO 20022 "Postal Address" and must comply with following requirements:

- Data element "Address Line" must not be used
- Data elements "Country" and "Town Name" must be used
- All other 12 data elements may be used depending on the components of the address.

Guidance for the provision of the ISO 20022 "Postal Address" based on the community practices is provided by the PMPG (SWIFT Payment Market Practice Group) that maintains a "SWIFT ISO20022 Structure Postal Address" to be found on its website.

Proposed changes to the 2025 EPC payment scheme rulebooks:

<u>Important:</u> amended specifications to the provision of the address of the Payer and of the Payee will also be reflected in the mandatory 2025 Customer-to-PSP and Inter-PSP Implementation Guidelines of each concerned EPC payment scheme rulebook.

A. SCT rulebook

4.6 Business Requirements for Attributes

	·	
Identification:	AT-P005	
Name:	The address of the Originator	
Description:	The information should reflect the address of the account holder being debited.	
	Applies for DS-02: This attribute is only mandatory when the Originator PSP or the	
	Beneficiary PSP is located in a non-EEA SEPA country or territory. This attribute	

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Identification:	AT-P005
Name:	The address of the Originator
	can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section Error! Reference source not found
	Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

Identification:	AT-E004	
Name:	The address of the Beneficiary	
Description:	The address of the Beneficiary as supplied by the Originator. This attribute can be provided in a an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section Error! Reference source not found. .	
	Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.	

B. SCT Inst rulebook

4.6 Business Requirements for Attributes

Identification:	AT-P005
Name:	The address of the Originator
Description:	The information should reflect the address of the Payment Account holder being
	debited.
	Applies for DS-02: This attribute is only mandatory when the Originator PSP or the
	Beneficiary PSP is located in a non-EEA SEPA country or territory. This attribute
	can be provided in an unstructured, hybrid or structured format following the
	specifications set out in the documents referred to in section Error! Reference
	source not found
	Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a
	structured address will be allowed. From that point in time onwards, the
	transmission of an unstructured address will no longer be allowed.

AT-E004
The address of the Beneficiary
The address of the Beneficiary as supplied by the Originator. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section Error! Reference source not found Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a
structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

C. SDD Core rulebook and Annex VII

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4.8.6 AT-E004 – The Address of the Creditor

Description:

The address of the Creditor as forwarded to the Debtor. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section Error! Reference source not found...

Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

4.8.10 AT-P005 - The Address of the Debtor

Description:

The address of the Debtor as registered by the Creditor. Only mandatory when the Creditor PSP or the Debtor PSP is located in a non-EEA SEPA country or territory. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section Error! Reference source not found...

Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

In the Annex VII of the SDD Core rulebook, the description of the attributes AT-E004 and AT-P005 will include these amendments as well.

D. SDD B2B rulebook

4.8.8.6 AT-E004 – The Address of the Creditor

Description:

The address of the Creditor as forwarded to the Debtor. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section Error! Reference source not found...

Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

4.8.10 AT-P005 - The Address of the Debtor

Description: The address of the Debtor as registered by the Creditor.

Only mandatory when the Creditor PSP or the Debtor PSP is located in a non-EEA SEPA country or territory. This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section Error! Reference source not found..

Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

In the Annex VII of the SDD B2B rulebook, the description of the attributes AT-E004 and AT-P005 will include these amendments as well.

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E. OCT Inst rulebook

Identification:	AT-P005
Name:	The address of the Payer
Description:	The information should reflect the address of the account holder being debited.
	This attribute can be provided in an unstructured, hybrid or structured format
	following the specifications set out in the documents referred to in section 0.5.1.
	Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a
	structured address will be allowed. From that point in time onwards, the
	transmission of an unstructured address will no longer be permitted.

Identification:	AT-P008	
Name:	The address of the Payer Reference Party	
Description:	The information should reflect the address of a person or entity in relation to	
	whom a Payer makes a payment.	
	This attribute can be provided in an unstructured, hybrid or structured format	
	following the specifications set out in the documents referred to in section 0.5.1 .	
	Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a	
	structured address will be allowed. From that point in time onwards, the	
	transmission of an unstructured address will no longer be permitted.	

Identification:	AT-E004
Name:	The address of the Payee
Description:	The address of the Payee as supplied by the Payer.
	This attribute can be provided in an unstructured, hybrid or structured format
	following the specifications set out in the documents referred to in section 0.5.1 .
	Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a
	structured address will be allowed. From that point in time onwards, the
	transmission of an unstructured address will no longer be permitted.

Identification:	AT-E009
Name:	The address of the Payee Reference Party
Description:	The information should reflect the address of a person or entity in relation to
	whom a Payee receives a payment.
	This attribute can be provided in an unstructured, hybrid or structured format
	following the specifications set out in the documents referred to in section 0.5.1 .
	Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a
	structured address will be allowed. From that point in time onwards, the
	transmission of an unstructured address will no longer be permitted.

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Identification:	AT-D006
Name:	The address of the non-Euro Leg Payer's FI
Description:	The information should reflect the address of the non-Euro Leg Payer's FI. When
	AT-D005 is provided, then AT-D006 must be provided.
	This attribute can be provided in an unstructured, hybrid or structured format
	following the specifications set out in the documents referred to in section 0.5.1 .
	Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a
	structured address will be allowed. From that point in time onwards, the
	transmission of an unstructured address will no longer be permitted.

Identification:	AT-C006
Name:	The address of the non-Euro Leg Payee's FI
Description:	The information should reflect the address of the non-Euro Leg Payee's FI. When
	AT-C005 is provided, then AT-C006 must be provided.
	This attribute can be provided in an unstructured, hybrid or structured format
	following the specifications set out in the documents referred to in section 0.5.1 .
	Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a
	structured address will be allowed. From that point in time onwards, the
	transmission of an unstructured address will no longer be permitted.

Identification:	AT-X005	
Name:	The address of the Intermediary FI(s) of the non-Euro Leg Payer's FI	
Description:	The information should reflect the address of the Intermediary FI(s) of the non-	
	Euro Leg Payer's FI. When AT-X004 is provided, then AT-X005 must be provided.	
	This attribute can be provided in an unstructured, hybrid or structured format	
	following the specifications set out in the documents referred to in section 0.5.1 .	
	Important: as of 22 November 2026 at XXHXX CET, only the use of a hybrid or a	
	structured address will be allowed. From that point in time onwards, the	
	transmission of an unstructured address will no longer be permitted.	

1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

Yes. This change will impact all EPC payment scheme participants and payment end-users.

2. Impact on the inter-PSP space:

Yes. Such change requires analyses of and implementation preparations for multiple EPC payment and non-payment related applications and databases at the EPC payment scheme participants.

3. Impact on other payment stakeholders:

Yes. Such change requires analyses of and implementation preparations for multiple EPC payment and non-payment related applications and databases at the (corporate) payment endusers.

In their payment files, they will have to provide their EPC payment scheme participants with at least hybrid or structured addresses about payers and payees.

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#06-All schemes-EPC-Introduction of Hybrid Address of the Payment End-User



4. Impact on the message standards (EPC Scheme Implementation Guidelines and other standards):

Yes.

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

No impact.

- 6. The nature of the change request:
 - a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

Yes.

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

No.

2. Elements of evaluation

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

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#06-All schemes-EPC-Introduction of Hybrid Address of the Payment End-User



	,
Is the change request a case for SEPA wide adoption?	YES. It aligns the specifications of an address about the payer and the payee in EPC payment transactions with the CBPR+ and HVPS+ transactions. The same address formats will be used for EPC payment, CBPR+ and HVPS+ transactions.
Is the change request underpinned by a cost-benefit analysis?	NO. But it is in line with international standardization efforts to structure ordering customer data in payments.
Does the change fit into the strategic objectives for SEPA?	YES. The use of at least hybrid addresses in EPC payment transactions can further reduce errors in payment processing, regulatory screening, and reconciliation. This should increase the straight-through-processing of EPC payment transactions.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES. EPC payment scheme participants and (corporate) end-users already using SWIFT MT messages must move to the delivery of at least hybrid addresses for international payments by November 2026 at the latest.
	The implementation period of up to November 2026 should give payment end-users sufficient time to determine the resources needed to accomplish this change.
Do you consider that the change request does not impede SEPA-wide interoperability?	NO.
Do you consider that the change request is in the scope of the scheme involved?	YES.

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Template for Proposing a Change Request in an EPC Payment Scheme

EPC 164-21 Version 1.1 28 March 2023

CR #08

Public

Approved

European Payments Council AISBL Cours Saint-Michel, 30 - B - 1040 Brussels T +32 2 733 35 33

Entreprise N°0873.268.927 secretariat@epc-cep.eu

Payments Council

European

Submit your responses by e-mail to change-request.EPC-scheme@epc-cep.eu by 31 December 2023

Name of contributor:	French Banking Federation	
Organisation:	French Banking Federation	
Address:		
Contact details:	Philippe Evenot – Geraldine Debost	
Your reference:	Extension of the time limit for initiating a Reversal	
Scheme and	SDD Core – SDD B2B	
document and		
version number:		
Request Date:	24 October 2023	
For information:	This template is provided by EPC to allow any person or organisation to	
	submit a change request for making a change to the EPC Payment Schemes	
	in accordance with the rules set out in the document 'EPC Payment Scheme	
	Management Rules' available on the EPC Website.	

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1.1. Suggested launch date (if any):

23 November 2025

1.2. Description of the change request:

The current timespan to send a reversal is 5 interbank Business Days after the settlement date.

Extract of 2023 SDD Core and SDD B2B Rulebooks

Reversals may only be processed from Settlement date and within the five Inter-PSP Business Days following the Due Date requested in the original Collection. Later presentations must not be processed by the Creditor PSP or CSMs mandated to act as such and the Debtor PSP must be so informed.

When a major incident with the send-out of a SDD collection (e.g., duplicate file) happens and the five Inter-PSP Business Days subsequent to the settlement date of the initial collection has passed, the Creditor PSP has no other choice than agreeing on a manual procedure in accordance with the debtor PSPs.

In this very specific situation, handling such procedure must be cumbersome for both Creditor and Debtor PSPs (and their respective customers) and results in wasting time and resources. As no other R-transaction for this kind of issue is at the disposal of the PSPs, the French PSP community suggests extending the timespan to send a Reversal from five to ten inter-PSP business days after the settlement date of the initial collection.

Extending the current timespan would avoid:

- Asking the Debtor PSP to initiate a Refund (MD06 or MD01) when the five inter-PSP Business days timespan is over. For lack of anything better such practice might be used as an emergency measures but has significant disadvantages in itself:
 - Even though not responsible for the disruption the debtor PSP is asked to play a major role in the solving of the incident (sending of refund, information towards their customers)
 - Use of diverted R-transactions (MD06 or MD01) which are deemed to be sent only on request of the debtors (and not used as a way to solve a technical disruption).

• Agreeing on the sending of a credit transfer from the creditors (or their PSPs) to the debtors to cancel the initial SDD collections.

Such practice is per se outside the SDD schemes and can create reconciliation issues and misunderstanding for both debtors and creditors and may lead to delays in processing the incident.

Risk of extending the current timespan:

• Currently conflicts with other r-transactions types, especially Returns, are possible within a maximum period of 5 Inter-PSP Business Days after the settlement date. With this change request, the timespan during which such crisscross happen would be extended to 10 days resulting in a higher risk of R-transactions crisscrossing. This impediment is largely outbalanced by the benefit of extending the STP reversal process time span (less expensive and easier to handle than a manual procedure) and can be mitigated by the launch of a coordinated plan between concerned PSPs as soon as the incident is detected.

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1.3. Wherever possible, please indicate:

1. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

None

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

Change in the SSD RB (EPC016-06 2023 SDD CORE, EPC222-07 2023 SDD B2B) - Reversals would need to be processed from Settlement date and within the ten Inter-Bank Business Days following the Due Date requested in the original Collection.

- 3. The nature of the change request:
 - a. **A change** (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)
 - b. A variant (adding an alternative optional rule alongside an existing Rulebook element)

2. Elements of evaluation

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

Is the change request a case for SEPA wide adoption?	Yes the extension of the timespan for reversal will spare any costly manual procedure on the debtor PSP side.
Is the change request supported by a cost- benefit analysis?	No
Does the change fit into the strategic objectives for SEPA?	Yes as it contributes to the quality of scheme
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	
Do you consider that the change request does not impede SEPA-wide interoperability?	
Do you consider that the change request is in the scope of the scheme involved?	Yes

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Template for Proposing a Change Request in an EPC Payment Scheme

EPC 164-21 Version 1.1 28 March 2023

CR #11

Public Approved European Payments Council AISBL Cours Saint-Michel, 30 - B - 1040 Brussels T +32 2 733 35 33 Entreprise N°0873.268.927

European

Payments Council

secretariat@epc-cep.eu

Submit your responses by e-mail to change-request.EPC-scheme@epc-cep.eu by 31 December 2023

Name of contributor:	Payment Scheme Evolution and Maintenance Working Group (PSEMWG) and One-Leg Out Task Force (OLO TF)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	#11-All schemes-EPC-Extension of Character Length for Name
Scheme and	Highlight which EPC Scheme Rulebook(s) this change request relates to:
document and	EPC125-05 2023 SEPA Credit Transfer Rulebook
version number:	EPC004-16 2023 SEPA Instant Credit Transfer Rulebook
	EPC016-06 2023 SEPA Direct Debit Core Rulebook
	EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook
	EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook
Request Date:	15 December 2023
For information:	This template is provided by EPC to allow any person or organisation to
	submit a change request for making a change to the EPC Payment Schemes
	in accordance with the rules set out in the document 'EPC Payment Scheme
	Management Rules' available on the EPC Website.

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1.1. Suggested launch date (if any):

16 November 2025 – effectiveness date of all five EPC payment scheme rulebooks.

1.2. Description of the change request:

- Originator (AT-P001), Originator Reference Party (AT-P006), Beneficiary (AT-E001) and Beneficiary Reference Party (AT-E007) for the SCT and SCT Inst rulebooks;
- Creditor (AT-E001), Creditor Reference Party (AT-E007), Debtor (AT-P001) and Debtor Reference Party (AT-P006) for the SDD Core and SDD B2B rulebooks;
- Payer (AT-P001), Payer Reference Party (AT-P006), Payee (AT-E001), Payee Reference Party (AT-E007), non-Euro Leg Payer's FI (AT-D005), non-Euro Leg Payee's FI (AT-C005), Intermediary FI(s) of the non-Euro Leg Payer's FI (AT-X004) for the OCT Inst rulebook.

The current limit of 70 characters for the name fields dates to the early development of the message specifications for the SCT rulebook in the 2000s. Initially, the 2006 message version of the ISO 20022 standard was used for these specifications. The 2006 message version had a limit of 70 characters for the name fields. When the first operational SCT scheme version was launched in 2008, it was based on the 2006 message version.

From the version 4.0 of the SEPA payment schemes entering into force in November 2010, they were based on the 2009 message version of the ISO 20022 standard which then already supported 140 characters for the name field. As there was no request from European communities to extend the name length for SEPA transactions, the limit of 70 characters was maintained and taken over as such for the SDD, SCT Inst and OCT Inst schemes.

The suggestion is to extend the number of characters of the name fields **for all upper-mentioned attributes** from 70 to 140 characters as:

- The 2019 ISO 20022 standard foresees up to 140 characters for the 'Debtor', 'Ultimate Debtor', 'Creditor', 'Ultimate Creditor' and 'Financial Institution' name fields.
- The Cross-border Payments and Reporting Plus (CBPR+) specifications also allow 140 characters for these name fields. This allows all EPC payment schemes, and the OCT Inst scheme in particular, to be aligned with these international specifications.
- The provision of extra characters allows payment service users to enter the complete name(s) concerned. This avoids the issue of data truncation and can provide the payment service user with further transparency about the identity of the payment counterparty and/or its reference parties and the financial institution(s) involved (the latter only for the OCT Inst scheme).
- The possibility to provide the complete name(s) can support the obligations for PSPs with respect to regulatory screening and up-front verification of payment counterparty names (such as Confirmation of Payee).

This proposed change does not impact the EPC payment scheme rulebooks themselves, but only their related Customer-to-PSP and inter-PSP implementation guidelines.

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Important: if the 2024 change request item #12 on the inclusion of the commercial trade name would be supported, the maximum length of the commercial trade name could become 140 characters as well (depending on the final message element selected to transport the commercial trade name).

1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

No. It does not impact the business rules of each scheme concerned as such.

2. Impact on the inter-PSP space:

Yes. it has major implications in the various systems supporting the acceptance, the processing and storage of EPC payment scheme transactions and related data.

PSPs must increase the character capacity for the various name fields in their payment initiation channels, their internal EPC payment transaction processing systems, and in their account statement and payment transaction archiving systems.

The transaction message exchange systems with other PSPs and with other inter-PSP space actors (e.g., CSMs) will have to be adapted as well to accept and to support the transmission of longer name data.

With respect to the OCT Inst scheme in particular: when (to be) provided, the legal entity name(s) of the non-Euro Leg FI(s) involved in the entire international payment chain can be delivered in full which facilitates further regulatory screening.

3. Impact on other payment stakeholders:

Yes. They will have the opportunity to send and/or receive the full first name(s) and surname(s) or the full legal entity name of themselves, their payment counterparties, and/or of their reference parties. The truncation of long names or of name combinations (e.g., account held by multiple natural persons) can be avoided at all or strongly reduced. This gives the payment service user more transparency about the identity of its payment counterparty and/or of its reference party.

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

No impact. The 2019 version of the ISO 20022 standard already supports the transmission of up to 140 characters for the name field. The maximum SEPA length for the name field must be set from 70 to 140 characters.

5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks: **No impact.**

6. The nature of the change request:

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- a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)
 Yes.
- b. A variant (adding an alternative optional rule alongside an existing Rulebook element)
 No.

2. Elements of evaluation

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

payment counterparty and/or their respective reference parties. For the OCT Inst scheme, it is also an alignment with the specifications set for a name field under the CBPR+ usage guidelines. Is the change request supported by a costbenefit analysis? Does the change fit into the strategic objectives for SEPA? The objectives for SEPA? The objectives for SEPA? The objectives for SEPA length for the name about the non-Euro Leg PSPs with the full or a more elaborate name about the non-Euro Leg FIs involved in the non-Euro Leg. The objectives for SEPA length for the name field must be set from 70 to 140 characters. The objectives for SEPA length for the name field must be set from 70 to 140 characters. The objectives for SEPA length for the name field must be set from 70 to 140 characters. The objective for SEPA length for the name field must be set from 70 to 140 characters. The objective for SEPA length for the name field must be set from 70 to 140 characters. The objective for SEPA length for the name field must be set from 70 to 140 characters. The objective for SEPA length for the name field must be set from 70 to 140 characters. The objective for SEPA length for the name field must be set from 70 to 140 characters. The objective for SEPA length for the name field must be set from 70 to 140 characters. The objective for SEPA length for the name field must be set from 70 to 140 characters.	Sufficient detail to allow the EPC to make all t	T
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does not impede SEPA-wide specific message element for EPC payment schem	the change resulting from the acceptance of	_
transactions.		NO. It only concerns extending the data capacity of a specific message element for EPC payment scheme transactions.
Do you consider that the change request is in the scope of the scheme involved?		YES.

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Template for Proposing a Change Request in an EPC Payment Scheme

EPC 164-21 Version 1.1 28 March 2023

CR #12

Public Approved European Payments Council AISBL Cours Saint-Michel, 30 - B - 1040 Brussels T +32 2 733 35 33 Entreprise N°0873.268.927 secretariat@epc-cep.eu

European

Payments Council

Submit your responses by e-mail to change-request.EPC-scheme@epc-cep.eu by 31 December 2023

Name of	Payment Scheme Evolution and Maintenance Working Group
contributor:	(PSEMWG)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	#12-All SEPA schemes-EPC-Inclusion of commercial trade name
Scheme and	Highlight which EPC Scheme Rulebook(s) this change request relates to:
document and	EPC125-05 2023 SEPA Credit Transfer Rulebook
version number:	EPC004-16 2023 SEPA Instant Credit Transfer Rulebook
	EPC016-06 2023 SEPA Direct Debit Core Rulebook
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Request Date:	15 December 2023
For information:	This template is provided by EPC to allow any person or organisation to
	submit a change request for making a change to the EPC Payment Schemes
	in accordance with the rules set out in the document 'EPC Payment Scheme
	Management Rules' available on the <u>EPC Website</u> .

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1.1. Suggested launch date (if any):

16 November 2025 – effectiveness date of the **four** SEPA payment scheme rulebooks concerned.

1.2. Description of the change request:

The <u>Statement</u> of the June 2021 Euro Retail Payments Board (ERPB) meeting endorsed a <u>set of recommendations</u> formulated by the ERPB working group on transparency for retail payment endusers.

One recommendation assigned to payment schemes such as the EPC payment schemes relates to the commercial trade name i.e. recommendation id 01: *Consistently use commercial trade name and provide this name to all involved parties in the payment chain for use in client's payment account statements*.

Furthermore, the commercial trade name is referred to in Article 25 'Information for the payer on individual payment transactions' of the proposed Payment Services Regulation (PSR), and in Article 2 (1c) of the amended SEPA Regulation.

The PSEMWG analysed to what extent the existing EPC payment scheme attributes suffice to meet the identified need or whether additional attributes would be needed.

Following this analysis, the following new attributes related to the "whom" are proposed being **yellow optional** fields in the relevant payment scheme implementation guidelines. As a yellow optional field, all scheme participants must support this ISO message element throughout their SEPA payment systems even though payment service users would still be free to use these elements or not.

A. SCT rulebook

New attributes

Identification:	AT-E002
Name:	The commercial trade name of the Beneficiary
Description:	The commercial trade name of the Beneficiary, if different to the legal name of
	the Beneficiary as used in AT-E001, as supplied by the Originator. This attribute is
	used in combination with AT-E001 and cannot substitute attribute AT-E001.

Identification:	AT-E008	
Name:	The commercial trade name of the Beneficiary Reference Party	
Description:	The commercial trade name of a person in relation to whom a Beneficiary	
	receives a payment, if different to the legal name of the Beneficiary Reference	
	Party as used in AT-E007. This attribute is used in combination with AT-E007 and	
	cannot substitute attribute AT-E007.	

These attributes are added in the following datasets in the SCT rulebook and related Annex V:

- DS-01 Customer-to-PSP SEPA Credit Transfer Information
- DS-02 The Inter-PSP Payment
- DS-04 The PSP-to-Customer SEPA Credit Transfer Information

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#12-All SEPA schemes-EPC-Inclusion of Commercial Trade Name



These new attributes will be indicated as <u>optional</u> attributes in the datasets DS-02 and DS-04. This means that only when these attributes are completed in DS-01, they must be transported as such in DS-02 and DS-04.

Changes to datasets in the SCT rulebook and related Annex V:

Identification	DS-04	
Name:	The PSP-to-Customer SEPA Credit Transfer Information	
Description:	Description of the minimum information that a Beneficiary PSP needs to make	
	available to the Beneficiary.	
Attributes	• ()	
contained:		
Rules applied:	()	
	A Beneficiary PSP may drop received extended Reference Party information	
	(attributes P006, P007, E007, E008, E010 and T007) and not make it available to a	
	Beneficiary who uses an interface which does not comply with the ISO 20022 XML	
	standard.	
Remarks:	These attributes reflect business requirements	

B. SCT Inst rulebook

New attributes

Identification:	AT-E002	
Name:	The commercial trade name of the Beneficiary	
Description:	The commercial trade name of the Beneficiary, if different to the legal name of	
	the Beneficiary as used in AT-E001, as supplied by the Originator. This attribute is	
	used in combination with AT-E001 and cannot substitute attribute AT-E001.	

Identification:	AT-E008	
Name:	The commercial trade name of the Beneficiary Reference Party	
Description:	The commercial trade name of a person in relation to whom a Beneficiary receives a payment, if different to the legal name of the Beneficiary Reference Party as used in AT-E007. This attribute is used in combination with AT-E007 and cannot substitute attribute AT-E007.	

These attributes are added in the following datasets:

- DS-01 Customer-to-PSP Credit Transfer Information
- DS-02 The Inter-PSP Payment
- DS-04 The PSP-to-Customer SCT Inst Information

These new attributes will be indicated as <u>optional</u> attributes in the datasets DS-02, DS-04 and DS-10. This means that only when these attributes are completed in DS-01, they must be transported as such in DS-02, DS-04 and DS-10.

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Changes to datasets in the SCT Inst rulebook

Identification	DS-04
Name	The PSP-to-Customer SCT Inst information dataset
Description	Description of the minimum information that a Beneficiary PSP needs to make
	available to the Beneficiary.
Attributes	• ()
contained	
Rules applied	()
	A Beneficiary PSP may drop received extended Reference Party information
	(attributes P006, P007, E007, E008, E010 and T007) and not make it available to a
	Beneficiary who uses an interface which does not comply with the ISO 20022 XML
	standard.
Remarks	These attributes reflect business requirements.
	This message cannot be confused with the dataset DS-10 Positive Notification
	Message to the Beneficiary.

C. SDD Core rulebook

New attribute sections

AT-E002 - The Commercial Trade Name of the Creditor

Description:	The commercial trade name of the Creditor, if different to the legal name of the
	Creditor as used in AT-E001, as supplied by the Creditor.
	This attribute is used in combination with AT-E001 and cannot substitute
	attribute AT-E001.

AT-E008 - The Commercial Trade Name of the Creditor Reference Party

1		,
	Description:	The commercial trade name of a person in relation to whom a Creditor collects a
		payment, if different to the legal name of the Creditor Reference Party as used
		in AT-E007. This attribute is used in combination with AT-E007 and cannot
		substitute attribute AT-E007.
		Information relating to a Creditor Reference Party is included only for the purpose
		of assisting the Debtor and/or Creditor in managing their payments and is not
		required to be provided to or by the Debtor PSP and/or Creditor PSP for the purpose
		of effecting the payment to which the information relates.

These attributes are added in the following datasets:

- DS-01 The Mandate
- DS-02 The Dematerialised Mandate
- DS-03 Customer to PSP Collection
- DS-04 The Inter-PSP Collection
- DS-12 The e-Mandate proposal /request message (only in Annex VII of the rulebook)
- DS-13 The validation message (only in Annex VII of the rulebook)

These new attributes will be indicated as

- Part of the sub-section 'Additional attributes for information only' in DS-01;
- New attribute items 'By the Creditor: E002... (optional)' and 'By the Creditor: E008... (optional)' in DS-01;

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#12-All SEPA schemes-EPC-Inclusion of Commercial Trade Name



- Attributes with the mention '(if present in DS-01)' in the dataset DS-02;
- Attributes with the mention '(if present in DS-02)' in the dataset DS-03;
- Attributes with the mention '(if present in DS-03)' in the datasets DS-04;
- Optional attributes in the datasets DS-12 and DS-13.

This means that only when these attributes are completed in DS-01, they must be transported as such in DS-03, DS-04, DS-12 and DS-13 included.

Amendments in Annex VII – e-Mandates: process steps PT-07.01, PT-08.01 and PT-09.01

(...)

"If the Creditor does not need to use the attributes "AT-E007 The name of the Creditor reference party", "AT-E008 The Commercial Trade Name of the Creditor Reference Party", "AT-E010 The identification code of the Creditor Reference party", "AT-P006 The name of the Debtor Reference party" and "AT-P007 The identification code of the Debtor Reference Party", he does not need to present these attributes in the template based on DS-01."

And add in the section "a. By the Creditor:" of each concerned process step, the new attributes AT-E002 and AT-E008 while indicating that both attributes are "(optional)".

D. SDD B2B rulebook

New attribute sections

AT-E002 - The Commercial Trade Name of the Creditor

- 3		
	Description:	The commercial trade name of the Creditor, if different to the legal name of the
		Creditor as used in AT-E001, as supplied by the Creditor.
		This attribute is used in combination with AT-E001 and cannot substitute
		attribute AT-E001.

AT-E008 – The Commercial Trade Name of the Creditor Reference Party

Description:	The commercial trade name of a person in relation to whom a Creditor collects a
	payment, if different to the legal name of the Creditor Reference Party as used
	in AT-E007. This attribute is used in combination with AT-E007 and cannot
	substitute attribute AT-E007.
	Information relating to a Creditor Reference Party is included only for the purpose
	of assisting the Debtor and/or Creditor in managing their payments and is not
	required to be provided to or by the Debtor PSP and/or Creditor PSP for the purpose
	of effecting the payment to which the information relates.
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These attributes are added in the following datasets:

- DS-01 The Mandate
- DS-02 The Dematerialised Mandate
- DS-03 Business Customer-to-PSP Collection
- DS-04 The Inter-PSP Collection
- DS-12 The e-Mandate proposal /request message (only in Annex VII of the rulebook)
- DS-13 The validation message (only in Annex VII of the rulebook)

These new attributes will be indicated as

Part of the sub-section 'Additional attributes for information only' in DS-01;

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#12-All SEPA schemes-EPC-Inclusion of Commercial Trade Name



- New attribute items 'By the Creditor: E002... (optional)' and 'By the Creditor: E008... (optional)' in DS-01;
- Attributes with the mention '(if present in DS-01)' in the dataset DS-02;
- Attributes with the mention '(if present in DS-02)' in the dataset DS-03;
- Attributes with the mention '(if present in DS-03)' in the datasets DS-04, DS-06, and DS-08 to DS-11 included;
- Optional attributes in the datasets DS-12 and DS-13.

This means that only when these attributes are completed in DS-01, they must be transported as such in DS-03, DS-04, DS-12 and DS-13 included.

Amendments in Annex VII – e-Mandates: process steps PT-07.01, PT-08.01 and PT-09.01

(...)

"If the Creditor does not need to use the attributes "AT-E007 The name of the Creditor reference party", "AT-E008 The Commercial Trade Name of the Creditor Reference Party", "AT-E010 The identification code of the Creditor Reference party", "AT-P006 The name of the Debtor Reference party" and "AT-P007 The identification code of the Debtor Reference Party", he does not need to present these attributes in the template based on DS-01."

And add in the section "a. By the Creditor:" of each concerned process step, the new attributes AT-E002 and AT-E008 while indicating that both attributes are "(optional)".

1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

Yes. This change will impact all SEPA payment scheme participants and payment end-users.

2. Impact on the inter-PSP space:

Yes. The new attributes require appropriate XML message fields and/or usage rules to be implemented by all SEPA payment scheme participants.

3. Impact on other payment stakeholders:

Yes. Payees now have the possibility to provide the payer with more details about the other name(s) the payee and the payee reference party use in their commercial activities. This gives the payer more information about the payee.

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

Yes.

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

No impact.

- 6. The nature of the change request:
 - a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

Yes.

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

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No.

2. Elements of evaluation

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

Same ent detail to allow the Er e to make an	- construction of the construction
Is the change request a case for SEPA wide adoption?	YES. It is based on the recommendation agreed upon by the supply side and the demand side of the euro payments market representatives in the Euro Retail Payments Board (ERPB).
	It also reflects the developments noted in the relevant (updated) EU legislations which refer to commercial trade names as well.
Is the change request underpinned by a cost-benefit analysis?	NO.
Does the change fit into the strategic objectives for SEPA?	YES. Transparency for the payment end-user is part of the ERPB's work plan.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	
Do you consider that the change request does not impede SEPA-wide interoperability?	NO.
Do you consider that the change request is in the scope of the scheme involved?	YES.

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Template for Proposing a Change Request in an EPC Payment Scheme

EPC 164-21 Version 1.1 28 March 2023

CR #13

Public Approved European Payments Council

European Payments Council AISBL
Cours Saint-Michel, 30 - B - 1040 Brussels
T +32 2 733 35 33
Entreprise N°0873.268.927
secretariat@epc-cep.eu

Submit your responses by e-mail to change-request.EPC-scheme@epc-cep.eu by 31 December 2023

Name of	Payment Scheme Evolution and Maintenance Working Group
contributor:	(PSEMWG)
Organisation:	EPC
Address:	
Contact details:	
Your reference:	#13-All SEPA schemes-EPC-Inclusion of reference party address
Scheme and	Highlight which EPC Scheme Rulebook(s) this change request relates to:
document and	EPC125-05 2023 SEPA Credit Transfer Rulebook
version number:	EPC004-16 2023 SEPA Instant Credit Transfer Rulebook
	EPC016-06 2023 SEPA Direct Debit Core Rulebook
	EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook
	EPC158-22-2023 One-Leg Out Instant Credit Transfer Rulebook
Request Date:	15 December 2023
For information:	This template is provided by EPC to allow any person or organisation to
	submit a change request for making a change to the EPC Payment Schemes
	in accordance with the rules set out in the document 'EPC Payment Scheme
	Management Rules' available on the EPC Website.

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1.1. Suggested launch date (if any):

16 November 2025 – effectiveness date of the **four SEPA** payment scheme rulebooks concerned.

1.2. Description of the change request:

The <u>Statement</u> of the June 2021 Euro Retail Payments Board (ERPB) meeting endorsed a <u>set of recommendations</u> formulated by the ERPB working group on transparency for retail payment endusers.

One aspect for which transparency can be improved is about the reference parties of the payer and of the payee.

The SEPA payment scheme rulebooks currently support only the exchange of the name and an identification code of such reference parties. The proposal is to also allow the exchange of the address of such reference parties. Payment end-users would no longer have to use other fields (such as the remittance information field) to provide such address data. It also allows better regulatory processing of such reference party data.

The following new attributes are proposed being **yellow optional** fields in the relevant payment scheme implementation guidelines. As a yellow optional field, all scheme participants must support this ISO message element throughout their SEPA payment systems even though payment service users would still be free to use this element or not.

Important: the proposed specifications to be followed to complete such addresses are aligned with the specifications proposed for the 2024 change request item #06.

Subject to the final decision by the Payment Scheme Management Board (PSMB) for item #06, the proposed address specifications for the reference parties may remain unchanged or may be adapted accordingly.

A. SCT rulebook

New attributes

Identification:	AT-P008	
Name:	The address of the Originator Reference Party	
Description:	The information should reflect the address of a person or entity in relation to	
	whom an Originator makes a payment.	
	This attribute can be provided in an unstructured, hybrid or structured format	
	following the specifications set out in the documents referred to in section 0.5.1.	
	Important: as of 22 November 2026, only the use of a hybrid or a structured	
	address will be allowed. From that point in time onwards, the transmission of an	
	unstructured address will no longer be allowed.	

Identification:	AT-E009	
Name:	The address of the Beneficiary Reference Party	
Description:	The information should reflect the address of a person or entity in relation to	
	whom a Beneficiary receives a payment.	
	This attribute can be provided in an unstructured, hybrid or structured format	
	following the specifications set out in the documents referred to in section 0.5.1.	

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Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

These attributes are added in the following datasets in the SCT rulebook and related Annex V:

- DS-01 Customer-to-PSP SEPA Credit Transfer Information
- DS-02 The Inter-PSP Payment
- DS-04 The PSP-to-Customer SEPA Credit Transfer Information

These new attributes will be indicated as <u>optional</u> attributes in the datasets DS-02 and DS-04. This means that only when these attributes are completed in DS-01, they must be transported as such in DS-02 and DS-04.

Changes to datasets in the SCT rulebook and related Annex V:

Identification	DS-04
Name:	The PSP-to-Customer SEPA Credit Transfer Information
Description:	Description of the minimum information that a Beneficiary PSP needs to make
	available to the Beneficiary.
Attributes	• ()
contained:	
Rules applied:	()
	A Beneficiary PSP may drop received extended Reference Party information
	(attributes P006, P007, P008, E007, E009, E010 and T007) and not make it available
	to a Beneficiary who uses an interface which does not comply with the ISO 20022
	XML standard.
Remarks:	These attributes reflect business requirements

B. SCT Inst rulebook

New attributes

Identification:	AT-P008
Name:	The address of the Originator Reference Party
Description:	The information should reflect the address of a person or entity in relation to
	whom an Originator makes a payment.
	This attribute can be provided in an unstructured, hybrid or structured format
	following the specifications set out in the documents referred to in section 0.5.1.
	Important: as of 22 November 2026, only the use of a hybrid or a structured
	address will be allowed. From that point in time onwards, the transmission of an
	unstructured address will no longer be allowed.

Identification:	AT-E009
Name:	The address of the Beneficiary Reference Party
Description:	The information should reflect the address of a person or entity in relation to
	whom a Beneficiary receives a payment.
	This attribute can be provided in an unstructured, hybrid or structured format
	following the specifications set out in the documents referred to in section 0.5.1.

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Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

These attributes are added in the following datasets:

- DS-01 Customer-to-PSP Credit Transfer Information
- DS-02 The Inter-PSP Payment
- DS-04 The PSP-to-Customer Credit Transfer Information

These new attributes will be indicated as <u>optional</u> attributes in the datasets DS-02 and DS-04. This means that only when these attributes are completed in DS-01, they must be transported as such in DS-02 and DS-04.

Changes to datasets in the SCT Inst rulebook

Identification	DS-04
Name	The PSP-to-Customer SCT Inst information dataset
Description	Description of the minimum information that a Beneficiary PSP needs to make
	available to the Beneficiary.
Attributes	• ()
contained	
Rules applied	()
	A Beneficiary PSP may drop received extended Reference Party information
	(attributes P006, P007, P008, E007, E009, E010 and T007) and not make it
	available to a Beneficiary who uses an interface which does not comply with the
	ISO 20022 XML standard.
Remarks	These attributes reflect business requirements.
	This message cannot be confused with the dataset DS-10 Positive Notification
	Message to the Beneficiary.

C. SDD Core rulebook

New attribute sections

AT-E009 - The address of the Creditor Reference Party

Description:	The information should reflect the address of a person or entity in relation to
	whom a Creditor collects a payment.
	This attribute can be provided in an unstructured, hybrid or structured format
	following the specifications set out in the documents referred to in section 0.5.1.
	Important: as of 22 November 2026, only the use of a hybrid or a structured
	address will be allowed. From that point in time onwards, the transmission of
	an unstructured address will no longer be allowed.

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AT-P008 – The address of the Debtor Reference Party

Description:	The information should reflect the address of a person or entity in relation to	
	whom a Debtor is debited for.	
	This attribute can be provided in an unstructured, hybrid or structured format	

This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

These attributes are added in the following datasets:

- DS-01 The Mandate
- DS-02 The Dematerialised Mandate
- DS-03 Customer to PSP Collection
- DS-04 The Inter-PSP Collection
- DS-12 The e-Mandate proposal /request message (only in Annex VII of the rulebook)
- DS-13 The validation message (only in Annex VII of the rulebook)

These new attributes will be indicated as

- Part of the sub-section 'Additional attributes for information only' in DS-01;
- New attribute items 'By the Creditor: E009... (optional)' and 'By the Debtor: P008... (optional)' in DS-01;
- Attributes with the mention '(if present in DS-01)' in the dataset DS-02;
- Attributes with the mention '(if present in DS-02)' in the dataset DS-03;
- Attributes with the mention '(if present in DS-03)' in the dataset DS-04;
- Optional attributes in the datasets DS-12 and DS-13.

This means that only when these attributes are completed in DS-01, they must be transported as such in DS-03, DS-04, DS-12 and DS-13 included.

Amendments in Annex VII – e-Mandates: process steps PT-07.01, PT-08.01 and PT-09.01 (...)

"If the Creditor does not need to use the attributes "AT-E007 The name of the Creditor reference party", "AT-E010 The identification code of the Creditor Reference party", "AT-E009 – The address of the Creditor Reference Party", "AT-P006 The name of the Debtor Reference party", "AT-P007 The identification code of the Debtor Reference Party" and "AT-P008 – The address of the Debtor Reference Party", he does not need to present these attributes in the template based on DS-01."

And add in the section "a. By the Creditor:" of each concerned process step, the new attribute AT-E009 while indicating that the attribute is "(optional)".

And add in the section "b. By the Debtor:" of each concerned process step, the new attribute AT-P009 while indicating that the attribute is "(optional)".

D. SDD B2B rulebook

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New attribute sections

AT-E009 – The address of the Creditor Reference Party

Description:

The information should reflect the address of a person or entity in relation to whom a Creditor collects a payment.

This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

AT-P008 – The address of the Debtor Reference Party

Description: The information should reflect the address of a person or entity in relation to whom a Debtor is debited for.

> This attribute can be provided in an unstructured, hybrid or structured format following the specifications set out in the documents referred to in section 0.5.1. Important: as of 22 November 2026, only the use of a hybrid or a structured address will be allowed. From that point in time onwards, the transmission of an unstructured address will no longer be allowed.

These attributes are added in the following datasets:

- DS-01 The Mandate
- DS-02 The Dematerialised Mandate
- DS-03 Customer to PSP Collection
- DS-04 The Inter-PSP Collection
- DS-12 The e-Mandate proposal /request message (only in Annex VII of the rulebook)
- DS-13 The validation message (only in Annex VII of the rulebook)

These new attributes will be indicated as

- Part of the sub-section 'Additional attributes for information only' in DS-01;
- New attribute items 'By the Creditor: E009... (optional)' and 'By the Debtor: P008... (optional)' in DS-01;
- Attributes with the mention '(if present in DS-01)' in the dataset DS-02;
- Attributes with the mention '(if present in DS-02)' in the dataset DS-03;
- Attributes with the mention '(if present in DS-03)' in the dataset DS-04;
- Optional attributes in the datasets DS-12 and DS-13.

This means that only when these attributes are completed in DS-01, they must be transported as such in DS-03, DS-04, DS-12 and DS-13 included.

Amendments in Annex VII – e-Mandates: process steps PT-07.01, PT-08.01 and PT-09.01

(...)

"If the Creditor does not need to use the attributes "AT-E007 The name of the Creditor reference party", "AT-E010 The identification code of the Creditor Reference party", "AT-E009 – The address of the Creditor Reference Party", "AT-P006 The name of the Debtor Reference party", "AT-P007 The identification code of the Debtor Reference Party" and "AT-P008 – The address of the Debtor Reference Party", he does not need to present these attributes in the template based on DS-01."

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And add in the section "a. By the Creditor:" of each concerned process step, the new attribute AT-E009 while indicating that the attribute is "(optional)".

And add in the section "b. By the Debtor:" of each concerned process step, the new attribute AT-P009 while indicating that the attribute is "(optional)".

1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

Yes. This change will impact all SEPA payment scheme participants and payment end-users.

2. Impact on the inter-PSP space:

Yes. The new attributes require appropriate XML message fields and/or usage rules to be implemented by all SEPA payment scheme participants.

3. Impact on other payment stakeholders:

Yes. Payers and payees now have the possibility to provide the payees and payers with concrete address details about their respective reference parties in their commercial activities. This gives the payer and the payee more information about the reference parties of the payee and of the payer.

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

Yes.

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

No impact.

- 6. The nature of the change request:
 - a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

Yes.

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

No.

2. Elements of evaluation

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

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#13-All SEPA schemes-EPC-Inclusion of Reference Party Address



adoption?	YES. It provides payers and payees more transparency about the reference parties on whose behalf the payee and payer is credited and debited.
Is the change request underpinned by a cost-benefit analysis?	NO.
	YES. Transparency for the payment end-user is part of the ERPB's work plan.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	
Do you consider that the change request does not impede SEPA-wide interoperability?	NO.
Do you consider that the change request is in the scope of the scheme involved?	YES.

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Template for Proposing a Change Request in an EPC Payment Scheme

EPC 164-21 Version 1.1 28 March 2023

CR #16

Public Approved European Payments Council AISBL
Cours Saint-Michel, 30 - B - 1040 Brussels
T +32 2 733 35 33
Entreprise N°0873.268.927
secretariat@epc-cep.eu

European

Payments Council

Submit your responses by e-mail to change-request.EPC-scheme@epc-cep.eu by 31 December 2023

Name of contributor:	Payment Committee Switzerland		
Organisation:	SIX Interbank Clearing Ltd		
Address:	Hardturmstrasse 201, 8021 Zürich		
Contact details:	Martin Walder, SIX BBS		
Your reference:	SEPA-2025-CR-Name		
Scheme and	Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:		
document and	EPC125-05 2023 SEPA Credit Transfer Rulebook		
version number:	EPC004-16 2023 SEPA Instant Credit Transfer Rulebook		
	EPC016-06 2023 SEPA Direct Debit Core Rulebook		
	EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook		
	EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook		
Request Date:	14.12.2023		
For information:	This template is provided by EPC to allow any person or organisation to		
	submit a change request for making a change to the EPC Payment Schemes		
	in accordance with the rules set out in the document 'EPC Payment Scheme		
	Management Rules' available on the EPC Website.		

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1.1. Suggested launch date (if any):

Change Cycle November 2025

1.2. Description of the change request:

This change request is linked to the potential change of the implementation of the structured address. If the hybrid address is not introduced or another decision is taken in regards of the structured address (e.g. postponement to a later change cycle), this CR becomes obsolete.

Preliminary explanation:

Based on section 0.5.1 SEPA Credit Transfer Scheme Implementation Guidelines (and equivalent in other rulebooks) the implementation guidelines are binding in the Customer-to-PSP space. Most Swiss PSP have already implemented the structured address based on the currently valid definition in their offering and internal application. While in the inter-PSP space the handling of the address has to be anyway less strict (e.g. supporting cross-border payment via SWIFT, bank-to-bank payments, cash-legs of other types of transaction), the rules in the Customer-to-PSP space are often implement more restrictively.

Change request (in case the content of the address of the involved parties was changed from structured to hybrid):

The hybrid address becomes only mandatory in the inter-PSP space. In the Customer-to-PSP space, the respective PSP is not obliged to support the hybrid address and can restrict its offering to structured address only.

1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

No impact.

2. Impact on the inter-PSP space:

No impact. PSPs can still use the hybrid address, e.g. to fulfil their compliance obligation.

3. Impact on other payment stakeholders:

Clients might have to follow a more restrictive validation of the address for the beneficiary (SCT, SCT Inst, OCT Inst) or the debtor (SDD, SDD business) when initiating a payment. Nevertheless, the impact is minor as those addresses are commonly already covered by the fully structured address.

The PSP, which already supports structured address with its solutions and applications do not have to adapt.

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EPC164-21 v1.1 EPC payment scheme change request template_Switzerland_CR_compliance_address.docx



4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

The preferred solution is, that the element "AdrLine", which is the added element in the hybrid address and the sole difference to the fully structured address, becomes an optional part only in the Inter-PSP-Guidelines (yellow field), but remains a white field in the Customer-to-Bank-Guidelines.

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

This change request is linked to "5.2 Compliance with the Rulebook", point 3 "The SEPA Credit Transfer Scheme Customer-to-PSP Implementation Guidelines when as Originator PSP it offers to its Originators the service of accepting and processing electronically bundled Customer-to-PSP Credit Transfer Instructions;"

- 6. The nature of the change request:
 - a. A change (an existing Rulebook element is deleted, amended or replaced by a new one, or a complete new Rulebook element is added alongside the existing Rulebook elements)

Option 1: the respective section in the rulebook might be changed in order restrict the binding in the Customer-to-PSP space.

b. A variant (adding an alternative – optional – rule alongside an existing Rulebook element) Option 2 (preferred): the changed attributes (hybrid address) are implemented only in the inter-PSP guidelines.

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Template for Proposing a Change Request in an EPC Payment Scheme

EPC 164-21 Version 1.1 28 March 2023

CR #17

Public Approved European Payments Council

European Payments Council AISBL
Cours Saint-Michel, 30 - B - 1040 Brussels
T +32 2 733 35 33
Entreprise N°0873.268.927
secretariat@epc-cep.eu

Submit your responses by e-mail to change-request.EPC-scheme@epc-cep.eu by 31 December 2023

Name of contributor:	Payment Committee Switzerland		
Organisation:	SIX Interbank Clearing Ltd		
Address:	Hardturmstrasse 201, 8021 Zürich		
Contact details:	Martin Walder, SIX BBS		
Your reference:	SEPA-2025-CR-Name		
Scheme and	Highlight which EPC SEPA Scheme Rulebook(s) this change request relates to:		
document and	EPC125-05 2023 SEPA Credit Transfer Rulebook		
version number:	EPC004-16 2023 SEPA Instant Credit Transfer Rulebook		
	EPC016-06 2023 SEPA Direct Debit Core Rulebook		
	EPC222-07 2023 SEPA Direct Debit Business to Business Rulebook		
	EPC158-22 2023 One-Leg Out Instant Credit Transfer Rulebook		
Request Date:	14.12.2023		
For information:	This template is provided by EPC to allow any person or organisation to		
	submit a change request for making a change to the EPC Payment Schemes		
	in accordance with the rules set out in the document 'EPC Payment Scheme		
	Management Rules' available on the EPC Website.		

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1.1. Suggested launch date (if any):

Change Cycle November 2025

1.2. Description of the change request:

The implementation guidelines referred in section 0.5.1 are changed for the following attributes:

P001 The name of the Originator

P006 The name of the Originator Reference Party

E001 The name of the Beneficiary

E007 The name of the Beneficiary Reference Party

or equivalent attributes (e.g. name of the Initiation Party or Originators in context of status reason information.

There should be no limitation of the maximum length such as today (max length 70 characters. The respective element in the ISO 20022 message allows 140 characters*.

(*In case the element in the ISO 20022 base message allows less than 140 characters, the maximum according to the base message should be applied).

Example:

Source: SEPA Credit Transfer Inter-PSP IGs 2023 Version 1.1

2.54	11	FITo FICustomer Credit Transfer V08	SEPA Rulebook	AT-P001 Name of the Originator.
		+Credit Transfer Transaction Information	SEPA Usage Rule(s)	Mandatory.
		++Debtor		'Name' is limited to 70 characters in length.
		+++Name	ISO Name	Name
			ISO Definition	Name by which a party is known and which is
				usually used to identify that party.
			XML Tag	Nm
			Type	Max140Text
			ISO Length	1 140
			SEPA Length	<i>I</i> 70

New: SEPA Length 1 .. 140, respective no SEPA limitation

1.3. Wherever possible, please indicate:

1. Impact on the Scheme in general:

No impact.

2. Impact on the inter-PSP space:

The respective elements have to be changed and supported by all CSMs and PSPs. With this change, the SEPA IGs will be aligned with CBPR+ (SWIFT) and other market practices.

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3. Impact on other payment stakeholders:

The respective elements have to be changed supported by all clients and PSPs. With this change, the clients and PSPs have no difference between a SEPA payment and cross-border payment based on CBPR+ (SWIFT) for static reference data.

4. Impact on the message standards (EPC Payment Scheme Implementation Guidelines and other standards):

Delete SEPA restriction and use ISO definitions for the respective elements.

- 5. Impact on the legal rules as defined in chapter 5 of the EPC Payment Scheme Rulebooks: n/a
- 6. The nature of the change request:
 - a. Change all implementation guidelines and change the maximal length of the respective elements.

Add an optional attribute

b. n/a)

Add an rule in regards of responses.

2. Elements of evaluation

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

sufficient detail to allow the EPC to make an evaluation of the change request submitted.		
Is the change request a case for SEPA wide adoption?	YES	
Is the change request supported by a cost- benefit analysis?	YES reference/client data can be used for SEPA in the same way as for other market practices	
Does the change fit into the strategic objectives for SEPA?	YES reference/client date can be used for SEPA in the same way as for other market practices	
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	YES, the affected elements are alreade are already in use with CBPR+ (SWIFT) without restriction of length	
Do you consider that the change request does not impede SEPA-wide interoperability?	YES changes supports interoperability	
Do you consider that the change request is in the scope of the scheme involved?	YES	

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2. Elements of evaluation

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

Is the change request a case for SEPA wide adoption?	YES
Is the change request supported by a cost- benefit analysis?	YES PSP already using the structured address in their application and channels do not have to change again.
Does the change fit into the strategic objectives for SEPA?	YES Overall, structured date are preferred.
Do you consider that the implementation of the change resulting from the acceptance of the change request is feasible?	
Do you consider that the change request does not impede SEPA-wide interoperability?	YES Inter-PSP is not affected.
Do you consider that the change request is in the scope of the scheme involved?	YES

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