



# SEPA Request-to-Pay (SRTP) Scheme Rulebook

## 2024 Change Proposal Submission Document Following the 2024 Public Consultation on SRTP Scheme Change Requests

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## **1 Introduction**

It is a key objective of the EPC that the SEPA Request-to-Pay (SRTP) scheme is able to develop with an evolving market. To meet the demands of the scheme participants and stakeholders including end-users and Service Providers (SP) communities, the SRTP scheme is subject to a change management process that is structured, transparent and open, governed by the rules of the management and evolution function of SEPA Scheme Management.

The first step in the SRTP scheme change management cycle is the introduction of change requests by any party with a legitimate interest. The change request submission period ended on 29 December 2023.

In consideration of the change requests received, the EPC's RTP Task Force (RTP TF) develops a public consultation document, containing the change requests and the related RTP TF recommendations following a detailed analysis.

All submitted change requests to modify the SRTP scheme rulebook received by the EPC are published through the public consultation document on the EPC website, permitting such a list to be openly viewed by all stakeholders. This public consultation ran from 12 March until 9 June 2024.

Following the termination of the three-month public consultation, the RTP TF collects and analyses the level of support and comments received for each change request, based on which it prepares change proposals.

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

The RTP TF consolidates the change proposals, along with each change request and the related non-confidential comments received from the contributors during the public consultation, in the change proposal submission document.

The change proposal submission document is then submitted to the EPC Board for decision-making purposes. The Board deliberates on the change proposal submission document from the RTP TF.

Finally, the change proposal submission document is published on the EPC website along with the decision of the Board on each change proposal.

## **2 Executive summary**

This change proposal submission document (EPC172-24) describes that each stage of the 2024 SRTP scheme rulebook change management cycle, from the initiation to the public consultation, has been properly completed in respect of each change request submitted.

The first step in the change management cycle was the submission of change requests to the SRTP scheme by any party with a legitimate interest. The change request submission period ended on



29 December 2023. The EPC received a total of 18 change requests for major changes and 1 for minor change to be introduced into the SRTP scheme rulebook.

The public consultation on possible modifications to be introduced into the SRTP scheme rulebook ran from 12 March until 9 June 2024. The following documents were published on the EPC website (link: <https://www.europeanpaymentscouncil.eu/document-library/other/public-consultation-sepa-request-pay-scheme-rulebook-change-requests>):

- SRTP Scheme Rulebook - Public Consultation Document on 2024 Change Requests (EPC027-24).
- Response template SRTP Scheme Rulebook 2024 Change Request Public consultation (EPC029-24).

This Change Proposal Submission Document contains for each change request:

- A description of the change request.
- The RTP TF recommendation provided as input for the public consultation.
- The RTP TF change proposal following the analysis of the public consultation results.
- Overview table containing the following information:
  - Contributor name.
  - Contributor support of the RTP TF recommendation.
  - Contributor comments.
- The Board decision on each RTP TF change proposal.

As a result of the 2024 SRTP scheme rulebook change management process, the rulebook has been updated to include:

- Several complementary reason codes;
- A list of options and optional Datasets and attributes;
- Some examples in the API specifications;
- Sealing requirements in the API specifications;
- A simplification of the homologation process.

In addition, the minor changes as defined in section 6.3 as well as a number of editorial updates to provide further clarification, ensure alignment with updated EPC processes or regulations or to correct typos have been included in version 4.0 of the SRTP scheme rulebook.

### 3 Overview 2024 major change requests and final Board decision

Item	Change request	Final Board decision
1	New file for Corporates containing the result of RTPs exchanged regarding their payments (SCTs or SCT Ints)	Cannot be part of the scheme as it is out of scope of the Scheme - <b>option e</b>
2	New reason code for Refusal by the Payer in AT-R004	Should be incorporated into the scheme - <b>option b</b>



Item	Change request	Final Board decision
3	New message to inform the Payee of the initiation/execution of the payment in Pay Later use cases	Cannot be part of the scheme as it is out of scope of the Scheme - <b>option e</b>
4	New reason codes in AT-R004 for non-acceptance of the Request to Pay in the case of e.g., “Instalment payments”	Should be incorporated into the scheme - <b>option b</b>
5	Not showing totally or partially Payee’s IBAN to the Payer	Cannot be part of the scheme - <b>option e</b>
6	B2B invoicing	Is already provided for in the scheme - <b>option a</b>
7	Possible changes related to the future ViDA regulation	Cannot be part of the scheme - <b>option e</b>
8	Not accepted Payee new reason code	Should be incorporated into the scheme - <b>option b</b>
9	Spam management	Should be incorporated into the scheme - <b>option b</b>
10	New reason code to respond to a cancellation request	Should be incorporated into the scheme - <b>option b</b>
11	Allow the Payer to pay later, after due date	The workaround should be incorporated into the scheme - <b>option b</b>
12	Addition of Sealing requirements in the ASF	Should be incorporated into the scheme - <b>option b</b>
13	Extension of Enrolment/Activation processes	Cannot be part of the scheme - <b>option e</b>
14	API sandbox and MVPs	Should be incorporated into the scheme - <b>option b</b>
15	Definition of reachable Payers and Payees and of the discovery service	Cannot be part of the scheme - <b>option e</b>
16	Possible required alignments with the payment schemes	Should be incorporated into the scheme - <b>option b</b>
17	Additional attributes linked to the Instant Payment Regulation	Should be incorporated into the scheme - <b>option b</b>
18	Simplify the SRTP scheme homologation process	Should be incorporated into the scheme - <b>option b</b>



## 4 Overview of Change Requests submitted for the the 2024 Public Consultation

### 4.1 Background

This section lists the change requests which were presented for public consultation along with the recommendation given by the RTP TF for each change request. Each recommendation reflects one of the following options:

- 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 becomes part of the scheme, and the rulebook is amended accordingly.
- c) The change request **should be included in the scheme** as an **optional feature**:
  - The new feature is optional, and the rulebook will be amended accordingly;
  - Each scheme participant<sup>1</sup> may decide to offer the feature to its customers, or not.
- d) The change request **is not considered fit for the SEPA geographic area**.
- e) The change request **cannot be part** of the scheme for one of the following reasons:
  - It is technically impossible or otherwise not feasible (to be explained on a case-by-case basis);
  - It is out of scope of the scheme.

### 4.2 Summary of change requests and the expressed support following the public consultation

Table 1 below provides an overview of the level of support from the contributors regarding the RTP TF recommendations presented during the public consultation. The list of contributors can be found in Annex I.

The contributors were invited to indicate (in the response template) their support concerning each RTP TF recommendation via providing a “Yes”, “No” or “No Opinion” response. Kindly note that the number of “No Opinion” positions have not been taken into account when determining the level of support for each change request.

Some contributors also provided additional comments which have been listed for each change request under “Public consultation feedback” (section 5).

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<sup>1</sup> A participant which has formally adhered to the scheme.



CR#	Contributor	Change request title	EPC RTP TF recommendation	Count "Yes"	Count "No"	Count "No opinion"	Count No Answer
1	Spanish Banking Community	New file for Corporates containing the result of RTPs exchanged regarding their payments (SCTs or SCT Insts).	e) The change request cannot be part of the scheme.	8	1	2	1
2	Spanish Banking Community	New reason code for Refusal by the Payer in AT-R004	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	9	1	1	1
3	Spanish Banking Community	New message to inform the Payee of the initiation/execution of the payment in Pay Later use cases.	e) The change request cannot be part of the scheme.	8	1	1	2
4	Spanish Banking Community	New reason codes in AT-R004 for non-acceptance of the Request to Pay in the case of e.g., "Instalment payments".	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	10	0	1	1
5	Spanish Banking Community	Not showing totally or partially Payee's IBAN to the Payer.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	8	1	2	1
6	Pine & Cone Oy	B2B invoicing	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	9	1	1	1
7	RTP TF	Possible changes related to the future ViDA regulation	b) The changes related to e-invoicing should be incorporated into the scheme: these changes become part of the scheme and the rulebook is amended accordingly.	9	0	2	1
8	RTP TF	Not accepted Payee new reason code	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	9	0	2	1
9	RTP TF	Spam management	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	7	2	2	1
10	RTP TF	New reason code to respond to a cancellation request	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	9	1	1	1
11	RTP TF	Allow the Payer to pay later, after due date	b) The <b>proposed workaround</b> should be incorporated into the scheme: the <b>workaround</b> becomes part of the scheme and the rulebook is amended accordingly.	7	2	2	1
12	RTP TF	Addition of Sealing requirements in the ASF	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	6	2	3	1
13	RTP TF	Addition of examples in the API specifications	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the API specifications are amended accordingly.	9	0	2	1
14	RTP TF	Extension of Enrolment/Activation processes	The market is invited to provide its opinion and suggestions in relation with this topic which will then be assessed by the EPC Board.	6	3	2	1
15	RTP TF	API sandbox and MVPs	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly. Some parts of this change requests (i.e. the API sandbox) could be implemented before the effective date of the next version (v4.0) of the SRTP scheme rulebook.	8	1	2	1
16	RTP TF	Definition of reachable Payers and Payees and of the discovery service	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	6	4	1	1
17	RTP TF	Possible required alignments with the payment schemes	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly, <b>in case those changes are included in the next version of the Payment schemes rulebooks.</b>	10	0	1	1
18	RTP TF	Additional attributes linked to the Instant Payment Regulation	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	10	0	2	0
19	RTP TF	Simplify the SRTP scheme homologation process	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme. This change requests could already be implemented by the end of 2024.	10	0	1	1



Table 1: Summary of change requests and the support expressed during the public consultation

## 5 Detailed overview of the major change requests

This section provides the following details for each major change request:

- Description of the change request.
- RTP TF recommendation provided as input to the public consultation.
- RTP TF change proposal following the analysis of the public consultation results.
- Overview table containing the following information:
  - Contributor name.
  - Contributor support of the RTP TF recommendation.
  - Contributor comments.
- The Board decision on each RTP TF change proposal.



## 5.1 # 1: New file for Corporates containing the result of RTPs exchanged regarding their payments (SCTs or SCT Insts).

### 5.1.1 Description

This change request was provided by the Spanish Banking Community.

It proposes to create a new ISO20022 message that can be used in the Customer to Bank space (Payee – Payee’s RTP & Payment Service Provider) in order to allow the Payee’s RTP & Payment Service Provider to facilitate reconciliation to Big Corporates and inform them about the actual result of RTPs sent in bulk within a specific period of time (day, week, month). Therefore, this new ISO message should be able to compose a bulk file, and from its fields should be easily derived whether each RTP sent has been confirmed, accepted, rejected, refused, cancelled, updated or, most importantly, paid.

This proposal tries to cover the Payee’s need to be informed about the actual results of RTPs with regard to their corresponding payments when they have been sent in high volumes within a specific period of time (day, week, month). The main aim is to facilitate to our Clients the reconciliation amongst RTPs and SCTs/SCT Insts when they have been transmitted in bulk via their PSPs.

### 5.1.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that this request for a reporting message is out of the scope of the SRTP scheme and more linked to the payment schemes. Due to the SRTP transaction cycle, the SRTP would be over when the reporting should be generated.

However, this service could be offered by the SRTP Service Providers outside the scope of the SRTP scheme. If necessary, additional fields could be added in the SRTP messages to be used in this reporting.

Therefore, the RTP TF recommends not taking forward the change request - **(option e)**.

### 5.1.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF recommends not taking forward the change request - **(option e)**.

The reporting message is out of the scope of the SRTP scheme due to the SRTP transaction cycle which ends once the SRTP has been accepted.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	No opinion	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the	Yes	



Contributor	Support	Contributor comments
Finnish banking community)		
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	No	<p>As we have observed amongst our clients, there's an actual need for a bulk standardised conciliation solution applicable all throughout Europe to be used in a common way by the Enterprises in the role of Payees. This solution should not mean the creation of new messages, but the reutilisation of those already existing. It would consist of two complementary bulks of information:</p> <p>1)A file with the accumulated details of responses received on the day (positive + negative) to the Request to pay issued on the same day or on previous days. This file could be built on the basis of accumulated pain.014.001.07 in DS-09 with Payee's RTP Service Provider positive and negative responses to the Payee (see SEPA Request-To-Pay (SRTP) Payee – Payee's RTP Service Provider SRTP Implementation Guidelines).</p> <p>2)A file with the details of Credit transfers received on the day corresponding to RTPs previously accepted. The messages contained in this file could adopt the format of pain.001.001.09 (DS-01 in SEPA Instant Credit Transfer Scheme Customer-to-PSP Implementation Guidelines). The periodicity of the transmission of the files to the Payees would depend on what had been previously agreed with them by their PSPs.</p>
Italian Banking Association	Yes	The reporting features could be offered to customer as additional service, not foreseen in the rulebook.
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	Pain.014 should be sufficient, if it's not then it should be brought up to the ISO 20022 PaySEG.
EuroCommerce	Yes	



#### 5.1.4 Board decision

The change request is not to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 5.2 # 2: New reason code for Refusal by the Payer in AT-R004

### 5.2.1 Description

This change request was provided by the Spanish Banking Community.

Due to the lack of experience regarding fraud in this new scheme, and in order to give more tools of protection to the Customer/Payer, it proposes to add and acknowledge “Suspicion of fraud” as a new reason code for Refusal by the Payer in AT-R004, and not only allow the chance of Reject for this reason to the Service Providers.

It means an additional reason code for non-acceptance of the Request to Pay by the Payer in attribute AT-R004.

### 5.2.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that this code could indeed be useful.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 5.2.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	No	Ask for legal opinion to the EPC regarding this CR.
Spanish Banking Community	Yes	
Italian Banking Association	Yes	
Sopra Steria Benelux - Galitt	No opinion	



Contributor	Support	Contributor comments
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	To be further clarified who is eligible to define whether the RTP is a suspect fraud. Could the RTP SP of the Debtor flag the RTP as possible fraud due to internal checks done before it is presented to the Debtor?
EuroCommerce	Yes	

#### 5.2.4 Board decision

The change request is to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



### 5.3 # 3: New message to inform the Payee of the initiation/execution of the payment in Pay Later use cases.

#### 5.3.1 Description

This change request was provided by the Spanish Banking Community.

It proposes to include a new message, in addition to the acceptance of the SRTP, that can be exchanged the moment after the payment has been made in Pay Later use cases.

Whenever the use case is a combination of Accept Now – Pay Later, the information of the initiation or execution of the payment cannot be conveyed to the Payee in the actual moment when it is made, because the acceptance (with its attribute AT-R114 ‘Payment initiation status related information’, foreseen to contain the payment information) has theoretically been issued long ago. The same applies to Accept Later – Pay Later, when the moment of the acceptance and the payment differ. In that way, the Payee loses track of the payment when it may be needed the most: in Accept Now – Pay Now the information of the payment status may not be that necessary since the payment may arrive within seconds with an SCT Inst or, at most, the day after with an SCT, whereas in Pay Later the payment may arrive any time within a specific period. For this reason, we would find it most convenient to incorporate a new message apart from the acceptance that can be exchanged the moment after the payment has been made in the Pay Later use cases. The flow of the information to the Payee with regard to the payment would then be complete.

#### 5.3.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that there are already existing messages to confirm the execution of a payment, but it is outside the scope of the SRTP scheme.

It would not be possible to include this in the SRTP scheme due to the life cycle of the SRTP messages that would be already finished when the reporting should be generated.

Therefore, the RTP TF recommends not taking forward the change request - **(option e)**.

#### 5.3.3 RTP TF Change Proposal and public consultation comments received

##### RTP TF Change Proposal:

The RTP TF recommends not taking forward the change request - **(option e)**.

The information message is out of the scope of the SRTP scheme due to the SRTP transaction cycle which ends once the SRTP has been accepted.

##### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the	Yes	



Contributor	Support	Contributor comments
Finnish banking community)		
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	Yes	
Italian Banking Association	Yes	Payment process should be separated from the RTP one.
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	No	Considering that existing super schemes that strive to make a stronger link between a RTP and the subsequent payment, an additional pain.014 optional attribute giving information about the payment status would be useful.
EuroCommerce		

#### 5.3.4 Board decision

The change request is not to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



5.4 # 4: New reason codes in AT-R004 for non-acceptance of the Request to Pay in the case of e.g., “Instalment payments”.

#### 5.4.1 Description

This change request was made by the Spanish Banking Community.

Even though “Instalment payments” and “Credit note” are scheme options that do not have to be mandatorily supported by all SRTP scheme Participants, and the Reject of SRTP message is allowed in these cases according to the SRTP scheme Clarification Paper (Annex III), there is no specific reason code in the rulebook for those Rejects. A dedicated code should be added within attribute AT-R004 (‘Reason code for non-acceptance of the RTP’) with the rest of the codes foreseen to reject an SRTP message.

This change request proposes to add new reason codes in AT-R004 ‘Reason code for non-acceptance of the RTP’ for non-acceptance of the SRTP in the case of the use of a scheme option.

#### 5.4.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that a new generic reason code "Option not supported" could be created for that purpose.

The RTP TF however notes that when the EPC Directory Service (EDS) will be launched, the scheme participants will be able to see the options that are supported or not by the SRTP Service Providers and shall therefore not send SRTP messages with non-supported options.

The RTP TF recommends including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

#### 5.4.3 RTP TF Change Proposal and public consultation comments received

##### RTP TF Change Proposal:

The RTP TF proposes to create two new reason codes for that purpose: “Request for instalment payments not supported” and “Credit note option not supported”.

The RTP TF however remarks that when the EPC Directory Service (EDS) will be launched, the scheme participants will be able to see the options that are supported or not by the SRTP Service Providers and shall therefore not send SRTP messages with non-supported options.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

##### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	



Contributor	Support	Contributor comments
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	Yes	
Italian Banking Association	Yes	
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	
EuroCommerce	Yes	

#### 5.4.4 Board decision

The change request is to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



5.5 # 5: Not showing totally or partially Payee's IBAN to the Payer.

#### 5.5.1 Description

This change request was made by the Spanish Banking Community.

It proposes not to show totally or partially the Payee's IBAN to the Payer.

In the context of the researches carried out with Corporates/Utilities Providers with the aim of discovering their demands regarding RTP, they have expressed unanimously their need to prevent the consumers from being able to visualise Payees' IBANs nor in SRTP nor in SCTs/SCT Insts issued after SRTP's approval. The reason would be to avoid the risk that their accounts might be used at a different moment with other purposes than to be credited for the debt specifically requested at that time. In such a way, they would be sparing potential problems of conciliation.

As observed, there are already e-commerce solutions in the market requesting a payment where Payee's IBAN is never shown to the Payer, even if the payment itself is an SCT Inst, and this does not diminish in any case the functionality nor the traceability of the operation since the Payment Service Providers are the ones in charge of preserving and exchanging the full data of the operation from end-to-end. Another example of this are SDDs collections, where the Payer does not see where their money is finally credited. What's more, taking into account that there already exists in SRTP the mandatory attribute AT- E005 "Payee's identification code" to allow Payee's recognition by the Payer, we believe that not showing totally or partially Payee's IBAN to the Payer would mean no harm to Payers and a great convenience for Payees.

#### 5.5.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF believes that this is part of the commercial relationship between the Payer's SRTP Service Providers and the Payers. The Payer's SRTP Service Providers could decide not to show the Payee's IBANs (totally or partially) since they can decide bilaterally with the Payers which of the attributes will be presented to them, depending on the nature of the Customer and the channel used.

In case this should be a choice made by the Payees, the RTP TF suggests providing an optional hint (i.e., an additional optional attribute) from the Payee to the Payer's SRTP Service Provider not to show its IBAN. The Payer's SRTP Service Provider would be free to take this hint into account or not.

The IBAN remains mandatory in the inter-SRTP Service Providers space.

Therefore, the RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

#### 5.5.3 RTP TF Change Proposal and public consultation comments received

##### RTP TF Change Proposal:

The RTP TF recommends not taking forward the change request - **(option e)** since it could increase the risk of fraud and possibly create a level playing field issue. In case it is required in some communities, it could be implemented as an Additional Optional Service (AOS).

##### Public consultation feedback:



Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	No	Given IP Regulation (VoP), unless local legislation requires to hide the IBAN.
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	subject to LSG investigation for IPR conformity and LPF compliance
Spanish Banking Community	Yes	
Italian Banking Association	No opinion	Being part of the relationship/commercial space, this feature should be ruled outside of the rulebook. Furthermore, it should be properly clarified how the payer's SRTPSP should manage the optional hint.
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	Important use cases related to payments to Public Administration and governments in Italy would highly benefit from this CR due to specific local policies related to C2G and B2G payments. Nonetheless, we do not agree with this sentence: "The Payer's SRTP Service Provider would be free to take this hint into account or not." - having the Payer's SRTP Service Provider ignoring this request to hide the IBAN would make the whole CR useless. There should be an explicit rule in the Rulebook to respect this Payee's request.
EuroCommerce	Yes	

#### 5.5.4 Board decision

The change request is not to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 5.6 # 6: B2B invoicing

### 5.6.1 Description

This change request was made by Pine & Cone Oy.

It proposes to include new optional data elements for structured invoice information in DS-01, DS-02 and DS-03e .

### 5.6.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that more optional data element in the SRTP message could be included in the next version of the SRTP scheme rulebook, however more details about the fields that should be added should be provided.

Since the change request CR#7 also proposes the possibility to attach e-invoices to the SRTP messages, the RTP TF proposes to only add the number of bills, the amount free of charge, and the VAT in the SRTP messages.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 5.6.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF is of the opinion that this change request is already provided for in the scheme – **(option a)**, since e-invoices can be attached to the SRTP messages which support the EN16391 standard formats.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	Conditional. Only for MVP1 (B2B) for E-invoicing (see CR15)
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	Yes	This request should be adopted as long those new fields to incorporate already exist in ISO20022.
Italian Banking Association	Yes	We support this change request, although we highlight that the RTP should not include all the information of the related



Contributor	Support	Contributor comments
		invoice, but only those that are necessary/useful for reconciliation purpose.
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	No	Electronic invoicing follows national rules, so it would be really difficult to standardize the minimum set of data to be added to the RTP message at EPC level. We think it would be better to postpone this CR to a later version of the Rulebook, after a broader use of the scheme is achieved.
EuroCommerce	Yes	

#### 5.6.4 Board decision

The change request is already provided for in the scheme.



## 5.7 # 7: Possible changes related to the future ViDA regulation

### 5.7.1 Description

This change request was provided by the RTP TF.

It proposes to make the SRTP scheme compatible with the European standard on e-Invoicing (EN16931) and the coming ViDA (VAT in the Digital Age) regulation.

The attachment attribute should be mandatorily supported by all the SRTP Service Providers in the SRTP and Credit Notes SRTP messages.

Additional reason codes for the non-acceptance of the SRTP could be added, such as "Type of attachment not supported" or "Attachment maximum size exceeded".

The SRTP messages could be adapted to include all the necessary data required to ensure a real-time e-reporting.

### 5.7.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that attachment attribute should be mandatorily supported by all the SRTP Service Providers, but only in the cases of e-invoicing and credit notes. The accepted format types would be the standard e-invoices formats (i.e., UBL, CII XML, FacturX).

New reason codes for the non-acceptance of the SRTP, such as "Type of attachment not supported" or "Attachment maximum size exceeded" could be added.

With regard to the e-reporting, the RTP TF believes that the topic is not clear and stable enough to determine which fields would be required.

The RTP TF suggests including the changes related to e-invoicing into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 5.7.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF recommends not taking forward the change request - **(option e)**, since the ViDA regulation is currently on hold. The change request could be re-assessed in a further version of the SRTP scheme rulebook.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	Conditional. Only for MVP1 (B2B) for E-invoicing (see CR15)
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	



Contributor	Support	Contributor comments
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	No opinion	Our thought is that this should apply in those specific cases of e-invoicing, who should be of optional exchange and easily identified.
Italian Banking Association	Yes	We support this change request. Still, we remark that this proposal should be better detailed to make it clear how the SRTP scheme should be reviewed to ensure compliance with the ViDA Regulation. Furthermore, the detailed list of the minimum invoice formats/standards that will be mandatorily accepted within the scheme must be defined.
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	The CR looks reasonable but there needs to be a clear definition of how to identify that the RTP refers to the e-invoicing case, i.e., when the conditional parameters become mandatory.
EuroCommerce	Yes	

#### 5.7.4 Board decision

The change request is not to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 5.8 # 8: Not accepted Payee new reason code

### 5.8.1 Description

This change request was provided by the RTP TF.

It proposes to include a new reason code for 'unknown' SRTP messages.

An SRTP message is considered as 'unknown' when the Payer's SRTP Service Provider does not think/know that an activation has been done with this specific Payee.

In this case, the SRTP SP should be able to reject the SRTP message and indicate that the reason of the rejection is "Unknown Payee".

Today, the Payer is already able to use this code to refuse an SRTP message. In the future, the Payer's SRTP SP should also be able to use this code.

It would be an additional protection for the Payers.

### 5.8.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 5.8.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	No opinion	We believe this request should be catalogued within a value added service, not in the general scheme, because it means to broaden the PSP's capability of decision, with a potential detriment for that of the Payers.



Contributor	Support	Contributor comments
Italian Banking Association	Yes	Although we support this proposal, we highlight that it would make the activation process more complex, risking limiting some business opportunities related to specific use cases.
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	This CR would be useful for a use case related to C2G and B2G payments in Italy.
EuroCommerce	Yes	

#### 5.8.4 Board decision

The change request is to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 5.9 # 9: Spam management

### 5.9.1 Description

This change request was made by the RTP TF.

It proposes to create a new attribute and a new process to allow the Payees to insert a specific code/reference in their first SRTP message to a specific Payer to inform the Payer's SRTP Service Provider that an activation with this Payer has been done outside the scope of the SRTP scheme.

The Payer and its SRTP SP should agree on a way to create specific codes/references that the Payer could share during the activation processes with new Payees. For example, as part of the enrolment process done between the Payer and its SRTP SP, the SRTP SP could provide some codes/references that the Payer could share when it proceeds with the activation of a new Payee.

The Payer should be able to give one different code to each Payee activated outside the scope of the SRTP scheme.

As part of the activation process done between the Payee and the Payer outside the scope of the SRTP scheme, the Payer and the Payee would agree on a specific code or reference to be used by the Payee in its first SRTP message sent to this Payer.

In this way, the Payer's SRTP SP will be able to differentiate a valid SRTP message from a spam one.

The activation after a one off, could be equivalent to "card on file" where the Payer accepts that the Payee keeps his SRTP address.

It should be further analyse whether the Payer's SRTP SPs should respond to the spammers that their messages have been rejected.

### 5.9.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the view that the process should be further described and clarified. In particular, the references to be used should be defined, a new specific field to include these references should be created, and all the use cases should be covered (e.g., when a QR code is flashed).

A new optional attribute "Activation reference" should be created.

In addition, a new reject reason code "Activation reference not valid" should be added in the list of reason codes for a reject by the Payer's SRTP Service Provider, attribute AT-R004 'Reason code for non-acceptance of the RTP'.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 5.9.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

A new optional attribute "Activation reference" should be created.

In addition, a new reject reason code "Activation reference not recognized" should be added in the list of reason codes for a reject by the Payer's SRTP Service Provider, attribute AT-R004 'Reason code for non-acceptance of the RTP'.



The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	No opinion	We find this request makes sense as a value added service, not in the general scheme.
Italian Banking Association	No	This change request adds much complexity to the SRTP scheme, compared to the its low benefits. At the same, there is no demand for such a feature that should be outside the scope of the scheme and managed in the competitive space between the payer and the payer's SRTP SP.
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	No	Keeping the activation within the scheme would be better in order to avoid adding extra complexity to the already supported use cases, since it effects multiple actors of the RTP scheme.
EuroCommerce	Yes	

5.9.4 Board decision

The change request is to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 5.10 # 10: New reason code to respond to a cancellation request

### 5.10.1 Description

This change request was provided by the RTP TF.

Following the receipt of a request for cancellation, the Payer’s SRTP Service Provider should be able to include in its negative answer to the Payee’s SRTP SP that the original SRTP has already been accepted and can therefore not be cancelled anymore. A new reason code “Already accepted RTP” should be added to the list of codes to be used in the attribute ‘Reason code for non-acceptance of the RfC of the RTP’ (AT-R112).

The RTP TF should then assess the need to remove the reason code “Payment already transmitted for execution”, as this would always happen after the acceptance.

### 5.10.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that in the attribute ‘Reason code for non-acceptance of the RfC of the RTP’ (AT-R112), the reason code “Payment already transmitted for execution” should be replaced by “Already accepted RTP”.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 5.10.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	No	We find both possibilities of use, consequently none of them should be excluded. "Payment already transmitted for



Contributor	Support	Contributor comments
		execution" should be maintained because it conveys useful information to the Payee.
Italian Banking Association	Yes	
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	
EuroCommerce	Yes	

#### 5.10.4 Board decision

The change request is to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 5.11 # 11: Allow the Payer to pay later, after due date

### 5.11.1 Description

This change request was provided by the RTP TF.

It proposes to allow the Payer which has already accepted an SRTP, to pay later, after due date and inform the Payee accordingly.

In case a Payer has already accepted an SRTP message but realizes that it will not be able to execute the payment on the agreed execution date, there should be a standardised way to inform the Payee that the payment will be done later.

However, the payment should still be done before the Expiry date of the SRTP.

### 5.11.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF points out that after acceptance, the life cycle of an SRTP message is terminated. Therefore it is not possible to change the response afterwards.

However, the RTP TF suggests a workaround which is to refuse the SRTP and use a new refusal code "Requested Execution Date of the payment not accepted" in the attribute AT-R004 'Reason code for non-acceptance of the RTP'.

The RTP TF suggests including the proposed workaround into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 5.11.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF suggests including the workaround into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	No opinion	
Dutch Payments Association	Yes	
Paycy-one GmbH	No	The workaround refusing the RTP with a reasonCode stating that it will be payed with a changed due date seems an inadequate way. Maybe a functionality like answering with ACWC should be used?
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		



Contributor	Support	Contributor comments
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	No	We consider this workaround would not be easy to explain to our clients and would not really mean an efficient solution to the problem.
Italian Banking Association	Yes	
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	We agree with the TF about the closure of the RTP process after the acceptance and the rejection of the extra message. Although, if this is true, we do not see the need to explicitly describe this workaround, since it would be (generally speaking) still applicable if the payment is executed after the ExpiryDate.
EuroCommerce	Yes	

#### 5.11.4 Board decision

The workaround is to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 5.12 # 12: Addition of Sealing requirements in the ASF

### 5.12.1 Description

This change request was provided by the RTP TF.

It proposes to add Sealing / non-repudiation requirements in the SRTP scheme rulebook and in the API Security Framework to provide the proof that an API client has indeed submitted a given request and vice versa an API server has indeed provided a given response.

### 5.12.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF points out that for the scheme participants, this would have a cost, a lot of work would be necessary since there is no international standard norm, and new certificates would be required.

It should be determined whether all fields should be covered by Sealing or only some specific fields.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 5.12.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF suggests including the change request in the SRTP scheme - **(option b)**.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	No opinion	
Dutch Payments Association	Yes	
Paycy-one GmbH	No	In our opinion the effort needed to realize this feature does not meet the benefit. Further the authentication and authorization is already handled by the input channel (API/EBICS/...).
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	Full encryption is not considered necessary at this stage



Contributor	Support	Contributor comments
Spanish Banking Community	No opinion	Since the data regarding this change request have not been explored and gathered yet, we cannot assess the impact of its adoption, but it should not be underestimated.
Italian Banking Association	Yes	
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	No	Given the technical and operational complexity of this change, we suggest to reject the CR and reconsider it at a later date, after more participants are active on the scheme and the effective needs arise.
EuroCommerce	Yes	

#### 5.12.4 Board decision

The change request is to be incorporated in the SRTP scheme.



### 5.13 # 14: Extension of Enrolment/Activation processes

#### 5.13.1 Description

This change request was provided by the RTP TF.

It proposes to extend the Enrolment/Activation (E/A) processes into a possible stand-alone scheme.

The Enrolment/Activation messages are the standardisation of message services and are successfully implemented in different areas in the world (e.g., Canada, Argentina, South Africa, Singapore) for RTP purposes.

Today on the market, it seems that there are no other E/A standards, even outside the payments sector (e.g., in Telecommunications, IT, etc). Therefore, based on the SRTP scheme E/A processes, the EPC could possibly define an E/A standard/scheme:

- general enough to be used by other EPC schemes (e.g., SPAA, CoP, ...)
- either based on the usage of XML ISO20022 messages or on APIs, based on RESTful APIs and JSON Objects.

The detailed description of the E/A processes and the related Datasets could be removed from the SRTP scheme rulebook which could refer to a new stand-alone ad-hoc overlay scheme.

#### 5.13.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that a new scheme would be outside the scope of the SRTP scheme, however if there is a market interest and subject to the approval of the EPC Board, should this change request be implemented, some changes would be required in the SRTP scheme to separate the Enrolment and Activation processes.

The RTP TF suggests to separate the features from the use of the ISO messages.

The market is invited to provide its opinion and suggestions in relation with this topic which will then be assessed by the EPC Board.

#### 5.13.3 RTP TF Change Proposal and public consultation comments received

##### RTP TF Change Proposal:

The RTP TF recommends not taking forward the change request - **(option e)**.

##### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	No opinion	
Dutch Payments Association	No	No added value for a separate E/A scheme. E/A messages now defined for SRTP, why should we remove them?
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	We concur with the suggestion of separating the processes from the SRTP scheme to create a separate stand-alone scheme.



Contributor	Support	Contributor comments
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	Other initiatives would need a standardized scheme to manage both enrollment and activation processes (in particular to materialize the consent)
Spanish Banking Community	No	By the time being, we don't find necessary to create a new scheme and we are not able to assess the impact of its application on others such as CoP, taking into account that it could eventually mean an additional burden more than a convenience.
Italian Banking Association	No	At this stage, we suggest avoiding introducing new functionalities/evolutions to the scheme. Indeed, the main focus now should be on pushing for the rapid take-off of the scheme. With specific reference to this proposal, we highlight that: - the SRTP scheme applies to various use cases, for which enrolment/activation processes could be not necessary (or different); therefore, we recommend leaving this process to the market, in terms of need and rules to apply, case by case - it should be evaluated if an enrolment/activation scheme would also be useful for other SEPA schemes and how it could be applied in such cases.
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	Separating the E/A processes into new schemes would be complex and possibly not useful in most cases. Among those two, the Activation process would benefit the most from a specific standardization (within the SRTP scheme) since it involves more actors of the scheme, while Enrollment could be done via bilateral agreements.
EuroCommerce		EuroCommerce supports the extension of the Enrolment/Activation (E/A) processes into a possible stand-alone scheme to enable an extensive usage when E/A procedures are required, such as digital wallet E/A .

#### 5.13.4 Board decision

The change request is not to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



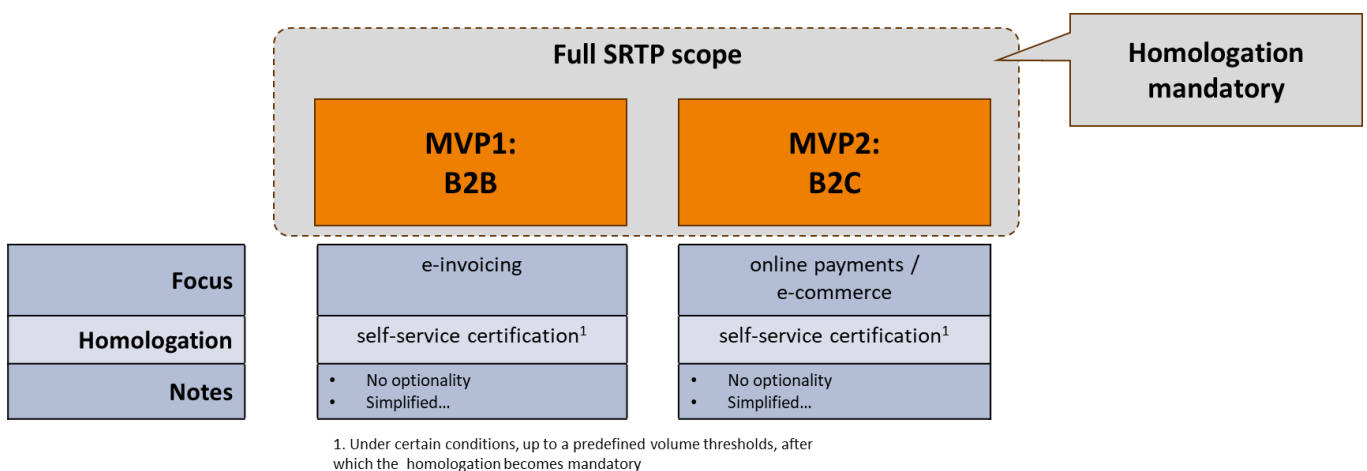
## 5.14 # 15: API sandbox and MVPs

### 5.14.1 Description

This change request was provided by the RTP TF.

It proposes on one hand to make an API sandbox, including a self-service certification, available to the SRTP scheme applicants. This would reduce the errors and timing needed to homologate, and it could also be used for a self-service certification under certain conditions to be determined (e.g., below a specific volumes threshold...) and for a specific period of time.

On the other hand, the SRTP scheme could be divided into two Minimum Viable Products (MVPs): B2B and B2C, in addition to the full SRTP scheme scope.



The participants could choose one MVP only and would then have to support all the functionalities/options included in the selected MVP. They should ensure reachability and interoperability within this MVP. In this case and subject to certain conditions, only a self-service certification (e.g., through an API sandbox) would be required. The required tests in the API sandbox would depend on the MVP selected.

A full membership, with choice of options, would also still be possible. Mandatory features must be respected.

The EPC could indicate in the Register of Participants (RoP) the MVP for which a participant is reachable. This information would also be stored by the default EPC Directory Service (EDS).

### 5.14.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that the content of each MVP should be defined and the conditions of the self-service certification should be determined.

The RTP TF encourages the market to propose other MVPs if required beside the B2B and the B2C ones.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**, and mentions that some parts of this change requests (i.e. the API sandbox) could be implemented before the effective date of the next version (v4.0) of the SRTP scheme rulebook.



### 5.14.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

The RTP TF recommends the use of a sandbox which could only be offered by Referenced Technical Solution Providers. The modalities should still be detailed at a later stage.

The Minimum Viable Product will consist in a set of core Datasets and attributes completed by identified options and optional Datasets/attributes.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	No opinion	We are unsure of the benefits creating a common sandbox to the scheme. However, we are not objecting.
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	Both could be applicable even before the entry into force of the next version of the rulebook
Spanish Banking Community	No opinion	Since the messages to develop would not vary enormously from one MVP to the other, we don't get to see the point of only adhering to one of them, and it may not reach the goal of achieving massive participation, but of adding more complication to the product itself.
Italian Banking Association	Yes	The introduction of specific sub-schemes to handle different use cases (B2B, B2C, B2G...) could be useful to differentiate functionalities (and the information that is exchanged in the RTP and related response) according to specific use case, allowing the SRTP SPs to join only the use-cases which they are interested in.
Sopra Steria Benelux - Galitt	Yes	The Homologation body supports the recommendation of a sandbox. It offers added value to developers to put in place a compliant SRTP system. It will also help streamlining the technical & functional testing and optimising homologation testing efficiency as the applicant can proof the system readiness.



Contributor	Support	Contributor comments
		<p>The implementation of the sandbox requires additional support for its users and to keep the sandbox in line with evolving requirements and with the simulator used for homologation testing.</p> <p>The Homologation body supports the recommendation of the self-certification that requires the use of several “qualified” tools. This qualification should rely on the EPC to ensure that these tools provide the same results. We consider that the current simulation tool “KaNest”, used in the SRTP homologation process, is de-facto a “qualified” tool and can be used for this purpose. The Homologation Body should anyway review the logs as a result of self-certification.</p> <p>The Homologation body supports the recommendation to implement MVPs on condition that the use is easily manageable, complexity is avoided, and interoperability and security risks are not increased. Also, the impact on homologation testing, sandbox and self-certification should be limited. The MVPs should be anyway a combination of “Minimum core of interoperable functions” and some options. New scheme flavours shouldn’t nurture the waiting mode of the market for SRTP scheme implementation and participation.</p> <p>As this CR has an impact on the homologation process, the Homologation Body proposes its expertise to contribute to the definition of the solution and to review the solution before final decision. Together with the EPC, an evaluation of the operational and financial impact of this change must be made.</p>
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	No	<p>This CR needs further context and explanation of the specific goal, and technical implementation. Some open points that need clarification to further evaluate the CR: who will expose the sandbox? What are the obligations for the RTP SPs regarding the MVPs? Are end-to-end tests between sandboxes foreseen/mandatory?</p>
EuroCommerce	Yes	

#### 5.14.4 Board decision

The change request is to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 5.15 # 16: Definition of reachable Payers and Payees and of the discovery service

### 5.15.1 Description

This change request was provided by the RTP TF.

It proposes to further define the concept of “Reachable” / “Reachability” and add a “discovery service”.

It should be clarified that it is possible to adhere to the SRTP scheme and reserve it only to some clients (category of clients, clients that have subscribed to a product, etc...).

The discovery service should ensure that a Payee/Payer has a way to know whether a Payer/Payee can use the SRTP services.

Today, the Payees/Payers have no automated way to know whether a Payer/Payee is enrolled. There should be a service for the Payees/Payers (e.g., along with B2B invoicing, to replace a reject SDD,...) to discover the SRTP address from the data the Payee/Payer already has from his Payer/Payee.

When the discovery is successful, the Payee/Payer can follow with an “activation request” (in or out of the SRTP scheme) to be sure that the Payer accepts to receive SRTP messages from this Payee.

The Payee/Payer would send as the “search key” the knowledge elements it has from the Payer/Payee (e.g., IBAN) and would get as a result either “not found” or the SRTP address of the Payer/Payee.

For privacy reasons, a Payer may request NOT to be “discoverable” and use only the SRTP services at his own initiative.

Also, to avoid spam of “fishing of SRTP addresses” a possible solution would be to allow the use of the discovery service only to the Payees that are already in relation with the Payer (e.g., whitelist), or to “reliable parties” (e.g., taxes), etc.

### 5.15.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that this service could be offered inside or outside the scheme, the discovery service should only be accessible to well enrolled Payees/Payers, the key for the discovery service should be determined, and in a first step, only the Payees could be queried via the discovery service.

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

### 5.15.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF recommends not taking forward the change request - **(option e)** for the time being given that the feedback of the public consultation was mitigated.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	



Contributor	Support	Contributor comments
Dutch Payments Association	No	Extra hurdle for adoption of SRTP
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	No	This could be considered as a value added service, but not within the general scheme, because it would complicate excessively the flow of the current SRTP.
Italian Banking Association	No	We do not support this change request aiming at introducing the "discovery service". Such functionality is out of the scope of the SRTP and must be left to the competitive space (if there is market demand).
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	No	We agree with the general description of this CR. Although, we have had discussions with corporates that declared their intention to use more than one RTP SP as Creditors/Payees. In such cases, a Debtor-initiated activation would explicitly require the identifier of the RTP SP of the Creditor as the correspondence would not be 1:1.
EuroCommerce	Yes	

#### 5.15.4 Board decision

The change request is not to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 5.16 # 17: Possible required alignments with the payment schemes

### 5.16.1 Description

This change request was provided by the RTP TF.

It proposes to include Changes resulting from an alignment with the payment schemes.

#### i. Structured / hybrid addresses

Introduce a hybrid address version by November 2025 alongside a structured address version and the hybrid address has no expiration date.

Allow the unstructured address version until November 2026.

The hybrid address: is a mix of structured and unstructured address details. It allows the combination of structured ISO 20022 address elements and up to two lines of 70 characters of unstructured "Address Line" <AdrLine>. The structured elements for "Country" <Ctry> and for "Town Name" <TwnNm> will become mandatory. Structured elements cannot be repeated in the <AdrLine> elements.

#### ii. Effective date + time on the Rulebook

Align the effective date of the SRTP scheme with the one of the payments schemes (i.e., Sunday 16 November 2025)

Add a effective time similar to one of the SCT Inst and OCT Inst schemes (i.e., Time effective: 03:30:00.000 CET)

#### iii. Extension of Character Length for Name

Extend the character length for the 'Name' fields from 70 to 140 characters

#### iv. Addition of ultimate Payee/Payer's name (and addresses) in the SRTP transactions

#### v. Optional use of Unique End-to-end Transaction Reference (UETR)

Introduce the UETR as a yellow-shaded optional attribute.

All participants must be able to accept, process and transmit the UETR further into the inter-SRTP SP space

#### vi. Unique Format of Acceptance Date Time Timestamp

Amend the Implementation Guidelines (IGs) to specify the number of digits allowed to represent milliseconds in the Date Time Timestamp.

One format of the "ISODate Time" should be specified for the Date Time message element in every SRTP message. SRTP SPs can then rely on a unified rule to track and reconcile their messages.

### 5.16.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b) in case those changes are included in the next version of the Payment schemes rulebooks.**

### 5.16.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:



The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b) in case those changes are included in the next version of the Payment schemes rulebooks.**

Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	Regarding the UETR , The EPC has provided a negative position regarding its usage for the SEPA Credit transfer and SEPA Instant Credit transfer Schemes, therefore even if optional the field UETR seems to be in contradiction with the global EPC position
Spanish Banking Community	Yes	
Italian Banking Association	Yes	The change requests incorporated in the SCT and SCT Inst schemes should be included in the STRP scheme as well, if needed
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	We agree with the TF. We also suggest that such approach would be automated (e.g., through references to the same structures among different scheme rulebooks).
EuroCommerce	Yes	

#### 5.16.4 Board decision

The change request is to be incorporated in the next version (v4.0) of the SRTP scheme rulebook when also included in the next version of the Payment schemes rulebooks.



## 5.17 # 18: Additional attributes linked to the Instant Payment Regulation (IPR)

### 5.17.1 Description

This change request was provided by the RTP TF.

It proposes to change the description/definition of the name of the Payee and trade name of the Payee attributes to facilitate the future mandatory IBAN Name check.

Today, the “Name of the Payee” (AT-E001) is a mandatory field in an SRTP message. But the “Trade Name of the Payee” (AT-E002) is optional.

The description of the “Name of the Payee” only states: “The information should reflect the name of the Payee (which can be different from the Trade Name)”.

In the future, the descriptions/definitions of the attributes “Name of the Payee” and “Trade Name of the Payee” should be further detailed to comply with the IPR and should make a distinction between natural and legal persons.

It should be clarified that:

- For natural persons, the first name and last name should be mandatory.
- For legal persons, the legal name or trade name should be mandatory (one or the other).

### 5.17.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)** to comply with the IP Regulation.

### 5.17.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	Yes	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)	Yes	According to the Instant Payments Regulation (IPR), PSPs can give the possibility to the payer to place a payment order by providing a payment account identifier together with data elements other than the name such as the Legal Entity Identifier (LEI) - see Article 5c(b). In this context, GLEIF



Contributor	Support	Contributor comments
		considers that the addition of attributes here should not be limited to the trade name of the payee, but should also include the Legal Entity Identifier when the payee is a legal entity, alongside other data elements that can unambiguously identify the payee under the IPR.
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	No opinion	
Italian Banking Association	Yes	
Sopra Steria Benelux - Galitt	No opinion	
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	We agree with the TF on the general approach, but we disagree on this sentence: "For legal persons, the legal name or trade name should be mandatory (one or the other)". We think that the legal name should always be requested by the rulebook, since a RTP is Creditor-initiated and there would be no point in using a trade name. The whole CR is also based on the assumption that a VoP would be needed in case of a RTP, but this may not be the case since the PSU would not be inserting the information about the payment.
EuroCommerce	Yes	Could you clarify why either the legal name or the trade name should be provided "For legal persons, the legal name or trade name should be mandatory (one or the other)."? We believe if a trade name is used, the legal name and the trade name should be provided?

#### 5.17.4 Board decision

The change request is to be incorporated as an optional feature in the next version (v4.0) of the SRTP scheme rulebook.



## 5.18 # 19: Simplify the SRTP scheme homologation process

### 5.18.1 Description

This change request was provided by the RTP TF.

It proposes to simplify the SRTP scheme homologation process, and to this end, remove the simplified B and A+B homologations since the homologation of the Referenced Technical Solution Provider (RTSP) should be enough to ensure the required level of security.

### 5.18.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF suggests including the change request into the next version (v4.0) of the SRTP scheme rulebook - **(option b)** and mentions that this change requests could already be implemented by the end of 2024.

### 5.18.3 RTP TF Change Proposal and public consultation comments received

#### RTP TF Change Proposal:

The RTP TF proposes to create of a ‘super simplified’ homologation for the applicants that are using a Referenced Technical Solution Provider (RTSP), which will consist in a documentary validation only.

The RTP TF suggests including some simplifications of the homologation process into the next version (v4.0) of the SRTP scheme rulebook - **(option b)**.

#### Public consultation feedback:

Contributor	Support	Contributor comments
Febelfin	No opinion	
Dutch Payments Association	Yes	
Paycy-one GmbH	Yes	
Finance Finland (on behalf of the Finnish banking community)	Yes	
Global Legal Entity Identifier Foundation (GLEIF)		
CFONB -CPC - GT Miroir EPC Request To Pay	Yes	
Spanish Banking Community	Yes	We strongly agree with this change but, nevertheless, would like to draw your attention to the date of its application. If the change does not apply until November 2024, we are afraid that many PSP that had plans to join the scheme in the coming months will delay their decision in order to avoid



Contributor	Support	Contributor comments
		<p>going through this process which, on the other hand, does not provide greater assurance for the PSPs that already operate other SEPA schemes. There is currently a risk about the lack of adoption of this scheme, thus do not put tackles on the process for those that are ready to process SRTP. That is why we request that this measure comes into effect as soon as possible, in order to facilitate the take-off of this scheme which, at least in the Spanish community, seems to arouse great interest</p>
<p>Italian Banking Association</p>	<p>Yes</p>	
<p>Sopra Steria Benelux - Galitt</p>	<p>Yes</p>	<p>The SRTP Homologation Body supports the idea that the homologation can be further optimised to minimise the effort of applicants using an RTSP but without increasing the risk to jeopardise the interoperability and credibility of the SRTP scheme. To ensure interoperability, end-to-end functional testing must stay mandatory.</p> <p>We don't support the straightforward exclusion of organisations from homologation using a RTSP. There are different kinds of Applicants &amp; TSPs, regulated and non-regulated. Especially for non-regulated SPs, currently eligible for simplified B homologation, homologation is necessary.</p> <p>The Homologation Body proposes to optimise the information assessment as part of homologation according to three categories :</p> <ul style="list-style-type: none"> <li>-No assessment : Regulated PSPs of a European Country</li> <li>-Limited assessment : Companies certified according to relevant standards matching the homologation requirements (ISO:27001 – Information Security, ISO:22301- business continuity...)</li> <li>-Full assessment : All other companies.</li> </ul> <p>The current homologation types already take into account the fact that some requirements can be implemented on TSP or applicant level. If certain requirements are not covered by the TSP service (R10, R11, R19), can we expect that the TSP takes the responsibility to ensure that the applicant has implemented these requirements?</p> <p>The Homologation Body has committed to setup a homologation process where the requirements were still in an evolutive mode. Several years have been invested to be ready</p>



Contributor	Support	Contributor comments
		<p>for homologation at the moment RB 3.0 was applicable. The return on this investment depends on the number of homologations agreed upon in the contract. The exclusion of applicants from homologation poses a significant risk that the investment cost isn't covered. Nevertheless, the Homologation Body is willing to work with the EPC to adapt the homologation types and process to mitigate that risk.</p> <p>As this CR has an impact on the homologation process, the Homologation Body proposes its expertise to contribute to the definition of the solution and to review the solution before final decision.</p>
J.P. Morgan	Yes	
CBI S.c.p.a. Benefit Corporation	Yes	<p>We strongly support this CR, as it will be an important catalyst of the diffusion of the Request-to-Pay within the Italian community, where the potentially high number of interested parties (mainly PSPs) may benefit from a centralized homologation process done by a collaborative platform. RTP use cases are being analysed in Italy and, should this CR be approved and implemented by the end of 2024, this could allow for the implementation of such use cases during 2025.</p>
EuroCommerce	Yes	

#### 5.18.4 Board decision

The change request is to be incorporated in the next version (v4.0) of the SRTP scheme rulebook.



## 6 Change Management Process in respect of minor changes

The RTP TF is required under the VOP scheme rulebook Management Rules to publish a list of minor changes on the EPC website and to ensure that the list may be viewed by all stakeholders. This obligation had been met by the publication of the *SRTP Scheme Rulebook - Public Consultation Document on 2024 Change Requests* (EPC027-24) on 12 March 2024.

For this release management cycle, the following minor change had been raised at the start of the public consultation:

Section	Description	Reason for change	Type of Change
SRTP related API Specifications	Addition of examples	This would make the implementation of the API and the testing easier	Clarification

During the public consultation, no additional minor changes had been raised.

## 7 Additional updates

In addition to the aforementioned minor and major changes, there are also a number of editorial updates that will be included in the next version of the SRTP scheme rulebook to provide further clarification, ensure alignment with updated EPC processes or regulations or to correct typos.

All the changes made compared to version 3.2 of the SRTP scheme rulebook will be listed in an annex of version 4.0 of the rulebook.



## ANNEX I: List of contributors

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

N°	List of contributors
1	Febelfin
2	Dutch Payments Association
3	Paycy-one GmbH
4	Finance Finland (on behalf of the Finnish banking community)
5	Global Legal Entity Identifier Foundation (GLEIF)
6	CFONB -CPC - GT Miroir EPC Request To Pay
7	Spanish Banking Community
8	Italian Banking Association
9	Sopra Steria Benelux - Galitt
10	J.P. Morgan
11	CBI S.c.p.a. Benefit Corporation
12	EuroCommerce