

<a href="https://www.europeanpaymentscouncil.eu/sites/default/files/kb/file/2024-03/EPC006-24%20SCT%20Scheme%20Rulebook%20-%20Public%20Consultation%20Document%20on%202024%20Change%20Requests.pdf">https://www.europeanpaymentscouncil.eu/sites/default/files/kb/file/2024-03/EPC006-24%20SCT%20Scheme%20Rulebook%20-%20Public%20Consultation%20Document%20on%202024%20Change%20Requests.pdf</a>							Name respondent:	Dutch Payments Association on behalf of the NL Community
Item	Contributor	Rulebook	Change request title	Topic	EPC PSEMWG assessment	EPC PSEMWG recommendation	Do you support the EPC PSEMWG recommendation?	Comment for (non-)support of the EPC PSEMWG recommendation
1	PSEMWG	SCT	Change request has been withdrawn	<b>Withdrawn</b>	Withdrawn	Withdrawn		
2	PSEMWG	SCT	Inclusion of Alias and Proxy Definitions	<b>Terminology</b>	With the insertion of the 'Proxy' and 'Alias' definitions from the Risk Management Annex (RMA) in the rulebook, the other stakeholders also have the same understanding about what is concretely meant with the terms 'Proxy' and 'Alias' in the scheme rulebook.	Inclusion into the scheme <b>(option b)</b> as of Nov 2025	YES	
4	PSEMWG	SCT	Change request has been withdrawn	<b>Withdrawn</b>	Withdrawn	Withdrawn		
5	PSEMWG	SCT	Change request has been withdrawn	<b>Withdrawn</b>	Withdrawn	Withdrawn		
6	OLO TF and PSEMWG	SCT	Introduction of Hybrid Address of the Payment End-User	<b>Address structure change</b>	This change request 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. 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.	Inclusion into the scheme <b>(option b)</b> as of Nov 2025	NO	In favour of maintaining the current EPC decision for providing structured addresses in SEPA transactions, because: <ul style="list-style-type: none"> <li>- simplifies the format for both the originator and beneficiary PSP and the PSU</li> <li>- simplifies screening of transactions</li> <li>- does not contradict with SWIFT which puts it forward as the preferred option</li> <li>- is always supported in all SEPA-countries: European addresses are easy to plot in the structured fields</li> <li>- unambiguous understanding of the tags</li> <li>- the current EPC decision is already communicated to the market</li> <li>- the implementation of the hybrid solution would introduce a Rulebook related change in 2026 (no longer accepting unstructured messages) while 2026 is not included in the two year</li> </ul>
9	Nordic Payments Council	SCT	Introduce pacs.009 to Replace pacs.008 for Inter-PSP Transactions	<b>New ISO message</b>	The introduction of such new pacs. message is a huge work for PSPs and CSMs. It only makes sense when the introduction of pacs.009 can be justified with a convincing level of expected transaction volume. The EPC wanted to keep the link between the initial SCT transaction and the inter-PSP payment for an inter-PSP fee/interest compensation related to that SCT transaction, and therefore opted for using a pacs.008 for the inter-PSP payment for such fee/interest compensation as well. In addition, a pacs.009 transaction is not a commercial payment but is normally treated via High-Value-Payment infrastructures such as T2. The PSEMWG is also unsure whether low-value high-volume retail payment CSMs would be willing to handle FI-to-FI payments as well.	Cannot be part of the existing scheme <b>(option e)</b>	YES	
10	Number of French PSPs	SCT	Possibility for Beneficiary to return a SCT (Inst) Transaction after the Amount is Credited	<b>Return procedure</b>	This change request is a fundamental change to the SCT scheme as the SCT transaction credit is final. It would change the legal nature of the transaction as currently the transaction becomes final once credited on the account of the Beneficiary. If the Beneficiary wants to send back the funds, it then must create a new transaction. The Beneficiary PSP can offer solutions to the Beneficiary to transfer back the funds in case e.g., the Beneficiary does not have the IBAN of the Originator at its disposal (in some SEPA countries, this IBAN is not shared with the Beneficiary). Furthermore, such solutions are part of the Customer-to-PSP space where commercial forces are at play.	Cannot be part of the existing scheme <b>(option e)</b>	YES	

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11	OLO TF and PSEMWG	SCT	Extension of Character Length for Name	<b>Attribute length</b>	<p>The 2019 ISO 20022 standard foresees up to 140 characters for the name fields.</p> <p>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.</p> <p>The possibility to provide the complete name(s) can support PSPs with respect to regulatory screening and up-front verification of payment counterparty names (such as Verification of Payee).</p> <p>The Cross-border Payments and Reporting Plus (CBPR+) specifications also allow 140 characters for these name fields.</p>	Inclusion into the scheme <b>(option b)</b> as of Nov 2025	NO	<p>The NL community sees insufficient business value in this proposal.</p> <p>Also the proposed change has a large impact on the PSPs':</p> <ul style="list-style-type: none"> <li>- databases</li> <li>- transaction processing systems</li> <li>- customer facing payment initiation channels</li> <li>- reporting systems and channels</li> </ul> <p>All the impacted systems for all the schemes have to be (re)tested in the payments chain which makes the impact comparable to the ISO 20022 version 2019 change.</p> <p>As PSPs' have to allocate our resources for all regulatory changes stemming from the Instant Payments Regulation, there is no capacity left to implement this change nor any other change related to the upgrade of existing or inclusion of new attributes (ISO tags).</p>
12	PSEMWG	SCT	Inclusion of Commercial Trade Name	<b>New attributes</b>	<p>To meet the recommendation from the Euro Retail Payments Board (ERPB) working group on transparency for retail payment end-users. 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.</p>	Inclusion into the scheme <b>(option b)</b> as of Nov 2025	NO	<p>The NL community sees insufficient business value in this proposal.</p> <p>Also the proposed change has a large impact on the PSPs':</p> <ul style="list-style-type: none"> <li>- databases</li> <li>- transaction processing systems</li> <li>- customer facing payment initiation channels</li> <li>- reporting systems and channels</li> </ul> <p>All the impacted systems for all the schemes have to be (re)tested in the payments chain which makes the impact comparable to the ISO 20022 version 2019 change.</p> <p>As PSPs' have to allocate our resources for all regulatory changes stemming from the Instant Payments Regulation, there is no capacity left to implement this change nor any other change related to the upgrade of existing or inclusion of new attributes (ISO tags).</p>

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13	PSEMWG	SCT	Inclusion of Reference Party Address	<b>New attributes</b>	To meet the recommendation from the Euro Retail Payments Board (ERPB) working group on transparency for retail payment end-users.	Inclusion into the scheme ( <b>option b</b> ) as of Nov 2025	NO	<p>The NL community sees insufficient business value in this proposal. Above that, we see additional privacy impact which does not seem to be taken into account.</p> <p>Also the proposed change has a large impact on the PSPs':</p> <ul style="list-style-type: none"> <li>- databases</li> <li>- transaction processing systems</li> <li>- customer facing payment initiation channels</li> <li>- reporting systems and channels</li> </ul> <p>All the impacted systems for all the schemes have to be (re)tested in the payments chain which makes the impact comparable to the ISO 20022 version 2019 change.</p> <p>As PSPs' have to allocate our resources for all regulatory changes stemming from the Instant Payments Regulation, there is no capacity left to implement this change nor any other change related to the upgrade of existing or inclusion of new attributes (ISO tags).</p>
15	Swiss banking community	SCT	Optional use of Unique End-to-end Transaction Reference (UETR)	<b>New attributes</b>	The members of the PSEMWG are not aware of any concrete demand from the market for having the UETR in the SCT scheme. Some stakeholders could see a potential benefit for the SCT scheme. But with the EU Instant Payments Regulation coming into force imposing PSPs in the EEA to offer instant euro credit transfers, the SCT Inst scheme may well overtake the SCT scheme in a few years' time. Therefore, the PSEMWG doubts whether it still makes sense to foresee the UETR in the	Cannot be part of the existing scheme ( <b>option e</b> )	YES	
16	Swiss banking community	SCT	Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	<b>Address structure change</b>	Reference is made to the change request item # 06. 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 Originator PSP is obliged to support at the request of the Originator. The section 0.5.1 of the rulebook points out that these IGs are binding supplements for the scheme participants.	Cannot be part of the existing scheme ( <b>option e</b> )	YES	
17	Swiss banking community	SCT	Extension of Character Length for Name	<b>Attribute length</b>	This change request has the same goal as the change request item # 11.	Inclusion into the scheme ( <b>option b</b> ) as of Nov 2025	NO	Refer to CR #11.
19	Spanish banking community	SCT	Partial Transfer Back of Funds in case of Reason 'Fraud'	<b>Recall procedure</b>	While the PSEMWG sympathises with the underlying rationale of the change request concerned, in the absence of a sound legal basis at EU level it cannot support it at this stage. Specific provisions allowing Beneficiary PSPs to unilaterally do a (partial) transfer back of funds in case of Fraud should be included into an EU legislation first before business rules and related liabilities can be addressed through the SCT Inst scheme rulebook. The development of the EU Payment Services Regulation (PSR) can be an opportunity to obtain such legislative coverage.	Cannot be part of the existing scheme ( <b>option e</b> )	YES	

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20	Slovak banking association	SCT	Extra Reason Code 'Fraud' for Request For Recall by the Originator (RFRO)	<b>RFRO procedure</b>	It is correct that the Recall procedure can be initiated only by the Originator PSP. However, the Originator PSP may do it on behalf of the Originator for the reasons Duplicate sending, Technical problems, and Fraud. Secondly, the Originator PSP must first assess whether the fraud claim from the Originator is justified before the claim is addressed to the Beneficiary PSP. When the Originator is a victim of a fraud, it must contact the Originator PSP to initiate a Recall request for the reason Fraud (as for the other two Recall reasons). The channels through which the Originator can escalate such fraud cases to the Originator PSP are part of the Customer-to-PSP space and lie outside the scope of the rulebook.	Cannot be part of the existing scheme ( <b>option e</b> )	YES	
21	Nordic Payments Council (NPC)	SCT	Extension of Character Length for Name	<b>Attribute length</b>	This change request has the same goal as the change request item # 11.	Inclusion into the scheme ( <b>option b</b> ) as of Nov 2025	NO	Refer to CR #11.
29	BPCE Group	SCT	Precisions on Recalls and Status Requests on Recalls	<b>Recall procedure</b>	The suggested amendments make the Recall procedure clearer.	Inclusion into the scheme ( <b>option b</b> ) as of Nov 2025	YES	
31	Slovak banking association	SCT	New XML Message Type to Exchange Extra Info between PSPs	<b>New ISO message</b>	The PSEMWG sees a very low volume for such information requests compared to the costs associated with it for each scheme participant and CSM to implement it.	Cannot be part of the existing scheme ( <b>option e</b> )	YES	