

<a href="https://www.europeanpaymentscouncil.eu/sites/default/files/kb/file/2024-03/EPC007-24%20SCT%20Inst%20Scheme%20Rulebook%20-%20Public%20Consultation%20Document%20on%202024%20Change%20Requests.pdf">https://www.europeanpaymentscouncil.eu/sites/default/files/kb/file/2024-03/EPC007-24%20SCT%20Inst%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1	PSEMWG	SCT Inst	Change request has been withdrawn	Withdrawn	Withdrawn	Withdrawn		
2	PSEMWG	SCT Inst	Inclusion of Alias and Proxy Definitions	Terminology	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 (option b) as of Nov 2025	YES	
3	OLO TF and PSEMWG	SCT Inst	New Entry-Into-Force Time of the SCT Inst and OCT Inst Scheme Rulebooks as of November 2025	Timeline changes	This point in time is considered to the most suitable time at which the lowest possible volume of transactions is processed while taking into account the range of geographical time zones in which the scheme is used.	Inclusion into the scheme (option b) as of Nov 2025	YES	
4	PSEMWG	SCT Inst	Change request has been withdrawn	Withdrawn	Withdrawn	Withdrawn		
5	PSEMWG	SCT Inst	Change request has been withdrawn	Withdrawn	Withdrawn	Withdrawn		
6	OLO TF and PSEMWG	SCT Inst	Introduction of Hybrid Address of the Payment End-User	Address structure change	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 (option 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 change process cycle.</li> </ul>
7	TIPS-Consultative Group from the ECB	SCT Inst	Unique Format of Acceptance Date Time Timestamp	Time format	<p>The PSEMWG suggests incorporating <b>only the first part</b> of the change request into the scheme, i.e. the attribute AT-056 being the timestamp must be unambiguous and at least include <b>milli</b>seconds.</p> <p>In case only seconds would be expressed, the milliseconds would then be rounded up to the next second. As the EU Instant Payments Regulation (IPR) amending the SEPA Regulation shortens the hard timeline for instant euro credit transfers to 10 seconds, a timestamp with at least milliseconds becomes very relevant to reject or not SCT Inst transactions due to a time-out.</p> <p>As for the suggestion for the exclusive use of one "ISODateTime" format for the SCT Inst timestamp, the PSEMWG <b>recommends not taking forward the second part</b> of the change request (option e).</p> <p>Several market infrastructures use different date time formats and it would generate an unnecessary burden on all systems. Changing the date time format usage rules would impact the whole end-to-end payment chain. Allowing the two date time formats is in line with the CBPR+ rules.</p> <p>The PSEMWG recommends allowing the two date time formats i.e. the UTC time format (YYYY-MM-DDThh:mm:ss.sssZ), and the local time with UTC offset format (YYYY-MM-DDThh:mm:ss.sss+/-hh:mm. This gives the PSPs flexibility. The PSEMWG does not see the added value of prescribing only one of the two formats.</p>	Inclusion of <b>only the first part</b> of the item into the scheme (option b) as of Nov 2025	YES	

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
9	Nordic Payments Council	SCT Inst	Introduce pacs.009 to Replace pacs.008 for Inter-PSP Transactions	New ISO message	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. 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	



Item	Conf Council	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
10	Number of French PSPs	SCT Inst	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 Inst scheme as the SCT Inst 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	
11	OLO TF and PSEMWG	SCT Inst	Extension of Character Length for Name	<b>Attribute length</b>	The 2019 ISO 20022 standard foresees up to 140 characters for the 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 and up-front verification of payment counterparty names (such as Verification of Payee). The Cross-border Payments and Reporting Plus (CBPR+) specifications also allow 140 characters for these name fields.	Inclusion into the scheme ( <b>option b</b> ) as of Nov 2025	NO	The NL community sees insufficient business value in this proposal.  Also the proposed change has a large impact on the PSPs': - databases - transaction processing systems - customer facing payment initiation channels - reporting systems and channels  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.  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).
12	PSEMWG	SCT Inst	Inclusion of Commercial Trade Name	<b>New attributes</b>	To meet the recommendation from the Euro Retail Payments Board (ERP) 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.	Inclusion into the scheme ( <b>option b</b> ) as of Nov 2025	NO	The NL community sees insufficient business value in this proposal.  Also the proposed change has a large impact on the PSPs': - databases - transaction processing systems - customer facing payment initiation channels - reporting systems and channels  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.  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).

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
13	PSEMWG	SCT Inst	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 Inst	Optional use of Unique End-to-end Transaction Reference (UETR)	<b>New attributes</b>	The PSEMWG does not see how the UETR adds value for the SCT Inst scheme as SCT Inst transactions must be completed within 10 seconds as stipulated by the future Instant Payments Regulation (IPR) that amends the <u>SEPA Regulation</u> .	Cannot be part of the existing scheme <b>(option e)</b>	YES	
16	Swiss banking community	SCT Inst	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>	NO	Refer to CR #6.
17	Swiss banking community	SCT Inst	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.

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
18	Dutch Payments Association	SCT Inst	Reduction of target maximum execution time and time-out deadline	<b>Timeline changes</b>	The entire SCT Inst processing timeline must be completely reconsidered in light of the contents of the Instant Payments Regulation (IPR) that amends the SEPA Regulation. Any change to the SCT Inst processing timeline will then be considered as a Regulatory Change under section 4.2.9 of the EPC Payment Scheme Management Rules.	Cannot be part of the existing scheme <b>for now (option e)</b>	NO	Given the fact that the Instant Payments Regulation was published in the Official Journal of the European Union, it is clear that the processing timelines have to be reduced.
19	Spanish banking community	SCT Inst	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	
20	Slovak banking association	SCT Inst	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	Cannot be part of the existing scheme <b>(option e)</b>	YES	
21	Nordic Payments Council (NPC)	SCT Inst	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.
26	BIZUM	SCT Inst	Possibility of Payment Reversal in the Inter-PSP Space	<b>Reversal voor SCI Inst</b>	The PSEMWG sees this CR as a new and complex SCT Inst r-transaction procedure for a very limited number of use cases and for a very limited volume of occurrences.	Cannot be part of the existing scheme <b>(option e)</b>	YES	
27	BIZUM	SCT Inst	Call for More Suitable Date and Time for Rulebook Version Change-Over (with no downtime)	<b>Timeline changes</b>	This change request has the same goal as the change request item # 03. However, all new versions of the EPC payment scheme rulebooks enter into force in the third full weekend of November of each year. This rule is applied since the launch of the SCT scheme back in 2008 and is in line with the annual SWIFT release calendar.	Inclusion into the scheme <b>(option b)</b> as of Nov 2025	YES	
29	BPCE Group	SCT Inst	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 Inst	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	
32	TIPS-Consultative Group from the ECB	SCT Inst	Optional use of Unique End-to-end Transaction Reference (UETR)	<b>New attributes</b>	The PSEMWG does not see how the UETR adds value for the SCT Inst scheme as SCT Inst transactions must be completed within 10 seconds as stipulated by the future Instant Payments Regulation (IPR) that amends the SEPA Regulation.	Cannot be part of the existing scheme <b>(option e)</b>	YES	