

https://www.europeanpaymentscouncil.eu/sites/default/files/kb/file/2024-03/EPC009-24%20SDD%20B2B%20Scheme%20Rulebook%20-%20Public%20Consultation%20Document%20on%202024%20Change%20Requests.pdf						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
6	OLO TF and PSEMWG	SDD B2B	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"> - simplifies the format for both the originator and beneficiary PSP and the PSU - simplifies screening of transactions - does not contradict with SWIFT which puts it forward as the preferred option - is always supported in all SEPA-countries; European addresses are easy to plot in the structured fields - unambiguous understanding of the tags - the current EPC decision is already communicated to the market - 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.
8	French banking community	SDD B2B	Extension of Time Limit for initiating a SDD Reversal	Timeline changes	There is no demand from PSPs or from Creditors to extend this period. The need to do a Reversal is due to an error by the Creditor. It is expected that the Creditor rectifies its error as soon as possible. The Creditor may agree with the Debtor to recover the funds outside of the scheme (e.g., by credit transfer). Allowing a longer timespan for Reversals will cause conflicts with other SDD r-transaction types. This will lead to new credit risks for the Creditor. The Debtor will very likely claim a Refund for an unauthorised collection.	Cannot be part of the existing scheme (option e)	YES	
11	OLO TF and PSEMWG	SDD B2B	Extension of Character Length for Name	Attribute length	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. The Cross-border Payments and Reporting Plus (CBPR+) specifications also allow 140 characters for these name fields.	Inclusion into the scheme (option 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': <ul style="list-style-type: none"> - 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).

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12	PSEMWG	SDD B2B	Inclusion of Commercial Trade Name	New attributes	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.	Inclusion into the scheme (option 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"> - databases - transaction processing systems - customer facing payment initiation channels - reporting systems and channels <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>
13	PSEMWG	SDD B2B	Inclusion of Reference Party Address	New attributes	To meet the recommendation from the Euro Retail Payments Board (ERPB) working group on transparency for retail payment end-users.	Inclusion into the scheme (option 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"> - databases - transaction processing systems - customer facing payment initiation channels - reporting systems and channels <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>
16	Swiss banking community	SDD B2B	Hybrid Address Mandatory in Inter-PSP Space and PSPs Are Free to Set only Structured Address in the Customer-to-PSP Space	Address structure change	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 Creditor PSP is obliged to support at the request of the Creditor. The section 0.5.1 of the rulebook points out that these IGs are binding supplements for the scheme participants.	Cannot be part of the existing scheme (option e)	YES	
17	Swiss banking community	SDD B2B	Extension of Character Length for Name	Attribute length	This change request has the same goal as the change request item # 11.	Inclusion into the scheme (option b) as of Nov 2025	NO	Refer to CR #11.