



EUROPEAN CENTRAL BANK

EUROSYSTEM

ERPB Secretariat

November 2023

ERPB/2023/019

Assessment of follow-up on ERPB statements, positions and recommendations

1. Introduction & summary

The aim of this document is to provide an overview on the follow-up of ERPB statements, positions and recommendations for which work is ongoing¹. The overview serves the purpose of keeping track at the ERPB level on whether ERPB statements, positions and recommendations are followed up with action by relevant stakeholders and, if not, to enable the ERPB to discuss possible remedies. A similar overview is provided for each meeting of the ERPB.

Based on the assessment by the Secretariat further progress was made since the last review on some of the past recommendations made by the ERPB. While progress has been achieved on the follow-up to ERPB recommendations, continued attention should be devoted to the implementation of the recommendations on transparency for retail payments end-users that require ongoing efforts from relevant stakeholders. The Secretariat will continue to monitor developments related to these open items and new recommendations and will report back to the next meeting of the ERPB (in June 2024).

¹ The record of past recommendations deemed closed as is available at: https://www.ecb.europa.eu/paym/groups/erpb/shared/pdf/12th-ERPb-meeting/Follow_up_on_past_recommendations.pdf?235684b4ccf985065f56691af48fcdeb

2. Methodology of the assessment

To ensure a better and more user-friendly overview of the status of the follow-up on past ERPB statements, recommendations and positions, a simple traffic light system with four grades is applied:

- **Red:** means that no significant efforts have been undertaken or there are significant obstacles faced by the relevant stakeholders preventing progress on the given recommendation or issue. Hence, **more attention and efforts are needed in the future and the recommendation or issue requires further attention at the ERPB level.**
- **Yellow:** means that *either*
 - efforts have been made on the given recommendation or issue by the relevant stakeholders but further – previously not planned – efforts may be needed *or*
 - there is a risk that obstacles may arise with regard to further progress on the recommendation or issue

The recommendation or issue could require further attention at the ERPB level in the future.

- **Green:** means that all necessary efforts have been made by the relevant stakeholders on the given recommendation or issue and the issue at hand is on track to be fully resolved in the near future. **Barring unexpected developments there is no need for further attention to the matter at the ERPB level.**
- **Blue:** means that the given recommendation or issue has been fully followed up / relevant stakeholders are in full compliance with the given recommendation and **the issue is to be treated as closed.**

These traffic lights are complemented by textual remarks / assessment of the follow-up on the given issue or recommendation to provide more detailed information and to underpin the traffic light assessment.

3. Overall assessment of the follow-up and status of ERPB recommendations, stances and statements

Overall, ERPB recommendations and statements made in the past meetings of the ERPB have been followed up by the relevant stakeholders.

Work continued on the follow-up to the ERPB recommendations regarding the development of a QR-code standard for instant payments (ERPB/2021/RecA and B). The ISO fast-track procedure for the specifications of QR-codes for (instant) credit transfers failed in July 2023. As a follow-up, and as agreed by the ERPB in previous meetings and reflected in previous ERPB statements, the European Payments Council (EPC) confirmed their intention to submit the standard to the European Committee for Standardization (CEN) through a fast-track procedure while withdrawing it from ISO. In this regard, the EPC started a liaison process with CEN, and after introducing some limited and necessary changes to the QR code standard (e.g. on the basis of technical comments received during the DIS ballot), will submit it to CEN for approval. The expected timeline is no less than 12 months. In addition, the EPC is continuing the work on the extension of the QR-code standard to other technologies such as NFC and BLE via its Multi-Stakeholder Group for Mobile initiated Credit Transfers (including SCT Inst).

Progress has also been achieved in the implementation of the recommendations on transparency for retail payments end-users endorsed by the ERPB in July 2021. Actions have in particular been undertaken in terms of standards that actors in the payment chain rely on. Good progress has been made due to efforts by the schemes to update their rules. Although these need to be finalised, there is the additional effort to amend the ISO 20022 standard to accommodate enough characters in the name field and to satisfy needs arising from transparency recommendations. Yet, as noted in past updates, continued attention should be devoted to the implementation of these recommendations. In particular, despite ongoing reminders to stakeholders' membership, it appears that in some instances the feedback received did not allow assessment of the extent of the progress. In this regard, it is recalled that the ERPB mandates foresees that Members ensure the proper communication and coordination of ERPB-related issues within the associations they represent (art. 3.3).

4. Detailed assessment of follow-up on ERPB statements, positions and recommendations²

ERPB recommendations on SEPA Credit Transfer (SCT) – SEPA Direct Debit (SDD) post migration issues made in December 2014

ERPB/2014/rec3: It is recommended to follow up with EU Member States and take appropriate action to ensure the enforcement of EU law related to payment accessibility as stipulated in Article 9, Regulation EU (No) 260/2012.

Addressed to: European Commission and Member States

Status: The SEPA implementation report adopted by the Commission in November 2017 comprehensively reviews the application of the Regulation in the 28 Member States and insists on the need for a continued fight against IBAN discrimination.

An assessment by the ESCB in the second half of 2018 notes that IBAN discrimination is still an ongoing issue and the ERPB urged national competent authorities to increase their efforts to tackle IBAN-discrimination and resolve complaints by consumers in a timely manner. The lack of action by competent authorities in several other Member States is being addressed by the Commission through a procedure called “EU-Pilot” which allows for direct communication between the Commission and the Member State concerned and is the last step before an infringement case is launched (if needed). Infringement proceedings against one Member State are ongoing.

In February 2022, the Commission updated the European Forum for Innovation in Payments (EFIP), the body which brings together the ERPB members and chairs of national committees, on the latest measures against IBAN discrimination.

Despite these efforts, IBAN discrimination still remains an issue and has even contributed to the emergence of a new business model of IBAN issuance, where a PSP in country A offers to consumers in country B to have a payment account located and serviced from country A but with a country B IBAN, meaning bearing the country code of that Member State. While the issuing of these IBANs is motivated by the willingness of PSPs to counter the adverse consequences of IBAN discrimination, eradicating IBAN discrimination must remain of utmost priority.

In June 2023, the EFIP co-chairs sent a letter informing members that IBAN discrimination will be discussed in the next EFIP meeting and inviting to reply to a questionnaire by 30 September 2023.

The assessment of the recommendation should thus remain yellow.

Assessment of follow-up: Yellow

ERPB/2014/rec13: It is recommended to look for more appropriate attributes in a long-term perspective (e.g., Legal Entity Identifier (LEI) as a unique entity identifier) to identify a creditor.

Addressed to: EPC (supported by the ECB and standardisation authorities)

Status: In 2015 and 2017, the EPC analysed the feasibility of using the LEI to identify creditors and found that the necessary conditions were not met in particular due to a low proportion of enterprises having an LEI.

It is noted that a change request related to LEI was received by the EPC from the market for the 2022 change management cycle of the SEPA payment schemes but was not supported by the public consultation.

The first release of the Rulebook of the SEPA Request-to-Pay (SRTP) scheme (published by the EPC at the end of November 2020) has introduced the LEI as a possible identifier for SRTP service providers. LEI is also supported in SEPA Proxy-Lookup (SPL) scheme.

² Based on feedback from the relevant (addressed) stakeholders.

Finally, the first release of the Rulebook on the SEPA Payment Account Access (SPAA), published by the EPC on 30th Nov 2022, has introduced LEI as a possible attribute identifying the Account Owner, in the list of payment accounts dataset.

Assessment of follow-up: No concrete follow-up actions needed at the ERPB level.

ERPB recommendations on pan-European electronic mandates made in December 2014

ERPB/2014/rec25: It is recommended– after putting in place the implementation acts as foreseen in the Regulation (EU) No 910/2014 – to continue to monitor the cross-border usage of qualified electronic signatures and, if needed, take further steps to ensure cross-border usability for payment service providers (PSPs) and PSUs.

Addressed to: European Commission

Status: Regulation 910/2014 ensures interoperability, based on mutual recognition of solutions for public services which should enable also the private sector to use qualified e-signatures on a cross-border level. The European Commission Action Plan insists further on encouraging remote ID recognition (action 11: "The Commission will facilitate the cross-border use of electronic identification and know-your-customer portability based on eIDAS to enable banks to identify customers digitally – Q4 2017"). In early 2018, the Commission launched a dedicated expert group to explore these issues further and to analyse whether common EU guidelines are necessary. The group, comprising of regulators, supervisors, financial institutions, consumer groups and representatives from the existing groups composed of experts from Member States on e-identity and anti-money laundering concluded its work in December 2019.

Two [reports](#) were then published in February 2020:

1. An overview and assessment of existing remote identification and on-boarding solutions in the banking sector, and;
2. Assessing Portable Know Your Customer (KYC)/Customer Due Diligence (CDD) Solutions in the Banking Sector – the Case for an Attribute-Based and Levels of Assurance (LoA)-rated KYC framework for the Digital Age.

The Commission adopted a proposal for a framework for a European Digital Identity (legislative package of a Regulation and a Recommendation on a European digital identity, replacing the eIDAS Regulation) on 2 of June 2021, which introduces an obligation for EU Member States to issue so-called European Digital Identity Wallets (EDIW). Together with legislative proposals to strengthen the EU's anti-money laundering and countering the financing of terrorism (AML/CFT) rules of 20 July 2021, the proposal should considerably reinforce the framework under which digital identities can be developed within the EU and the deployment of solutions in the financial sector.

The European Digital Identity proposal is currently under the co-decision procedure, trilogues started in March 2023. The preliminary political agreement from June 2023 is expected to be confirmed in November. In parallel, in the framework of the e-IDAS expert group, the Commission Services are working with Member States on a common Union Toolbox, which will develop the technical framework for the EDIWs. The first version of the Toolbox (v.1.0.0) was published on 10 February 2023, and an updated version (v.1.1.0) was published on 25 April 2023. A revised version (v. 1.2) will tentatively be published in November 2023. The Commission published a call for support for the implementation of the European Digital Identity Framework - the so-called Large Scale Pilot (LSP) on 22 February 2022, to test the interoperability and scalability of use-cases within national and cross-border implementation contexts and to build the necessary expertise and infrastructure to facilitate the provision of the EUDI Wallet. The LSPs started their work on 1 April 2023 and will run for 2 years.

Assessment of follow-up: Green

ERPB recommendations and invitations on person-to-person (P2P) mobile payments made in June

2015

ERPB/2015/rec1: Consensus and cooperation between the existing local solutions should be developed by organising a forum for existing EU P2P mobile payment solutions to work on pan-European interoperability. In particular, the forum should come together to develop a set of rules and standards (framework) related to joining and using pan-European mobile payment services. In addition, a governance structure (responsible for, inter alia, defining, publishing and maintaining the framework) needs to be set up.

Addressed to: EPC and existing providers of P2P mobile payment solutions

Status: The Mobile Proxy Forum (MPF) has published the rules for operating, joining and participating to the SEPA Proxy Lookup (SPL).

The MPF came to an agreement on the future governance of the SPL service, which should be set up as part of the EPC.

Following the signing of the transfer of copyright agreement in relation to the SPL rules and the SPL API specification by the EPC and MPF in July 2018, the MPF was disbanded and the EPC started with preparing the implementation of the SPL scheme. The EPC has assumed its role of SPL scheme manager by establishing a scheme participant group (made up of all registered, committed or “interested” eligible scheme participants) reporting to the EPC Board, as a replacement for the MPF (this group had its inaugural meeting on 27 September 2018).

The first release of the SPL scheme Rulebook (including API specifications) was published by the EPC in December 2018. The second release of the Rulebook was published in March 2020 with an effective date of 1 June 2020. No decision has been made yet on whether/when to initiate a new change management cycle.

Assessment of follow-up: No immediate follow-up required at the ERPB level. The recommendation has been followed-up by implementing the SPL scheme and service while it is so far not used.

ERPB recommendations related to mobile and card-based contactless payments

ERPB/2015/rec9: The ERPB recommends to:

- i. Define an aligned European mandate for the implementation of contactless-enabled POIs, including a specification of where they should be available. The ECB should act as facilitator for this. (June 2016)
- ii. Harmonise the level of transaction limits at POIs at country level for each use case/payment context. (Ongoing)
- iii. Request the use of open protocols in the POI domain and the POI-to-acquirer domain which are compliant with the SEPA Cards Standardisation Volume and labelled by the Cards Stakeholders Group. (June 2017)
- iv. Mandate a common implementation plan for the EMV Next Generation specifications with an appropriate migration period. (December 2017)

Addressed to: Card scheme sector

Status: (i) The majority of the newly implemented terminals have contactless capability and, in general, markets are working to the international schemes’ mandates for the deployment of contactless terminals, as terminals accept international schemes in addition to the domestic schemes. In this context, international schemes have mandated POI contactless capability since 2020 and local schemes are aligned with them.

(ii) The level of transaction limits is harmonised in most countries and the tendency is to increase the contactless transaction amount limit. Due to COVID-19 the limit has increased to 50 euros across several Member States.

(iii) Most of the main pan-European implementation specifications had already obtained a label by the EPSG (previous ECSG).

(iv) A common implementation plan has not been adopted yet.

Assessment of follow-up: Green

ERP/2015/rec14: The ERPB recommends requiring mobile devices to be certified in accordance with the future “Smart Secure Platform” being developed by ETSI (see ERP/2015/rec 13). (December 2018)

Addressed to: Mobile payment service providers

Status: ETSI has completed the work on all the test specifications required for SSP certification however, SSP has not yet been implemented.

Assessment of follow-up: **Green**

ERP/2015/rec16: The ERPB recommends providing access to the mobile device’s contactless interface in order to ensure that the consumer can have a choice of payment applications from different mobile payment service providers, independently of the mobile device and the operating system used. (Ongoing)

Addressed to: Mobile device manufacturers, mobile operating system developers, GSMA/MNOs, and competition authorities

Status: On 16 June 2020 the European Commission (DG-Competition) opened antitrust investigations, inter alia, into practices regarding access to mobile device’s contactless interface (NFC) by Apple. On 2 May 2022, the Commission sent a Statement of Objections informing Apple of its preliminary view that Apple abused its dominant position in mobile wallet markets on iOS devices and restricted competition by limiting access to the NFC technology. Apple examined the documents in the Commission’s investigation file, replied in writing and request an oral hearing which took place in February 2023. A Statement of Objections is a formal step in an antitrust investigation which does not prejudge the outcome. The investigation is ongoing. In addition, the Digital Markets Act, on which agreement between co-legislators has been reached and which was published in the Official Journal on 12 October 2022, will have a direct effect on access to NFC for mobile payments. It will require companies designated as gatekeepers to ensure effective interoperability with hardware and software features they use themselves in their ecosystems. The Apple Pay investigation will inform the future application of the Digital Markets Act with regard to the analysis of the security concerns and effective and proportionate access to NFC.

Assessment of follow-up: **Yellow**

ERPB recommended requirements on Payment initiation Services (adopted in June 2018)

ERP/2018/sta1: The ERPB confirmed the technical, operational and business requirements stemming from the November 2017 working group report. Technical requirements should however be considered in light of the developments that occurred since then and in particular in view of the Opinion provided by the EBA and the work of the API Evaluation Group. The ERPB also endorsed the set of additional business and operational requirements stemming from the June 2018 working group report.

Status: With regard to technical requirements, such as those for the Account Servicing PSP (ASPSP)-Third Party Provider (TPP)-interfaces and their functionality, the API Evaluation Group published the final outcome of its work on recommended functionalities on 10 December 2018³, including those issues where consensus between the API Evaluation Group members has not been possible.

For the operational requirements, relating to PSD2-certificates and operational directory services, the latest version of the ETSI technical standard covering the regulatory technical standards requirements on certificates has been published in March 2019. The EBA register of payment and electronic money institutions under PSD2 went live on 19 March 2019. Multiple providers are offering operational directory services in which an ASPSP can check -also in real-time during a payment initiation or account information request- whether the TPP is (still) authorised.

With respect to business requirements, i.e. those relating to event and dispute handling, at least one provider is offering such a mechanism.

(Note: In order to reap the full benefits of PSD2 for the provision of innovative and competitive payment initiation and account initiation services, the ERPB agreed to define the key elements of a Scheme. The ERPB working group on a SEPA API access scheme agreed on a report defining those key elements, with the understanding that the scheme is the best approach to unlock the opportunities beyond PSD2, with a fair distribution of value and risk between the actors. The report was endorsed by the ERPB in its June

³<https://www.europeanpaymentscouncil.eu/sites/default/files/kb/file/2018-12/API%20EG%20045-18%20Recommended%20Functionalities%2010%20December%202018.pdf>

2021 meeting, and the EPC was invited to take up the role of a scheme manager. The EPC started this work in Q4 2021. The EPC published the version 1.0 of SEPA Payment Account Access (SPAA) rulebook on 30 November 2022 (in which all the services were positioned as optional). An updated version 1.1 was published on 26 June 2023 including, inter alia, extended sections regarding Strong Customer Authentication (SCA) and the definition of minimum viable product (MVP) options. The EPC Board is expected to be invited at its 21 November 2023 meeting to approve the publication of v1.0 of the SPAA scheme's "Default Fees" on the EPC website.

Assessment of follow-up: **Green**

ERPB recommendations related to instant payments at the point-of-interaction (adopted in November 2019 and November 2020)

ERPB/2019/recA: The ERPB recommends developing: (i) a dedicated interoperability framework with common rules and procedures, and (ii) a pan-European label and its usage for instant payment at POI solutions. These developments should take into account the work executed under ERPB/2019/recB, ERPB/2019/recC, and ERPB/2019/recD.

Addressed to: ERPB Working Group on instant at POI, Multi-Stakeholder Group on Mobile Initiated Credit Transfers (MSG MSCT)

Status: The ERPB Working Group on instant payments at POI has submitted a document on an Interoperability Framework for instant payments at the POI to the November 2020 ERPB meeting. Further work on the establishment of the framework with an appropriate governance would be needed subject to ERPB approval.

The MSG MSCT has developed a presentation proposing two different views concerning the development of a pan-European label for instant payments at POI solutions that was submitted to the November 2020 ERPB meeting. The ERPB took note of the MSG MSCT's analysis and invited the EPC to present the outcome of any further work in light of market development to the June 2021 ERPB meeting. The ERPB took note of the subsequent position taken by the EPC during their June 2021 ERPB meeting.

The work on a dedicated interoperability framework and a pan-European label will be further followed-up under recommendation ERPB/2020/recC.

Assessment of follow-up: **Green**

ERPB/2019/recC: The ERPB recommends developing functional and security specifications for interconnectivity of instant payments at POI solutions, including the specification of the minimal data set to be exchanged between consumer and merchant while covering different proximity technologies. This work should serve as input to the work under ERPB/2019/recA.

ERPB/2020/recA: The ERPB recommends

- Analysing the interoperability of additional flows and "R"- messages between the respective instant payments service providers in the case of unsuccessful /failed transactions.
- Further analysing technical interoperability for models involving a PISP or CPSP.
- Analysing the impact of replies to EBA Q&A questions¹ posted by the MSG MSCT on technical interoperability of instant payments at the POI and related security aspects;
- Developing use cases for instant payments at the POI where the consumer device has no internet connection at the time of transaction (offline use cases) and analyse their impact on interoperability.

These deliverables should serve as inputs for any further work on an Interoperability framework for instant payments at the POI.

Addressed to: MSG MSCT

Status on the two above recommendations:

The functional and security specifications for interconnectivity as well as the minimum data sets to be exchanged between the consumer and the merchant and their respective instant payments service

providers have been specified in the 2nd edition of the MSCT Implementation Guidance (MSCT IG - EPC269-10v2.0), published in February 2022, following a 3-month public consultation on the EPC website.

The MSCT IGv2.0 also address the technical interoperability of MSCTs involving a PISP or CSP. This MSCT IG also contain a few so-called offline use cases that have been further analysed in view of the EBA answers received on Q&A 2020_5247 and 2020_5367 since its publication. This will be reflected in the next edition of the MSCT IG. The recently developed document on Interoperability of MSCTs based on NFC or BLE (EPC287-22) also specifies offline use cases for both proximity technologies. The latter document has been finalised in June 2023.

Assessment of follow-up: [Blue](#)

ERP/2019/recD: The ERPB recommends (i) conducting a technical and security analysis on possible proximity conflicts at the POI addressing multiple payment instruments (card payment, instant credit transfers, etc.); (ii) developing appropriate specifications to enable consumer selection of preferred payment instrument to conduct a transaction at the POI. This work should serve as input to the work under ERP/2019/recA.

Addressed to: ERPB WG on instant at POI, MSG MSCT

Status: A joint Task Force between the ERPB Working Group on instant payments at POI and the ECSG has developed a dedicated document that specifies principles and provides an overview on use cases for consumer selection of preferred payment instrument to conduct a transaction at the POI, which was submitted to the ERPB in November 2020 and published as ERP/2020/27. This recommendation could be further evaluated and addressed by the EPSG⁴ in view of their scope extension.

Assessment of follow-up: [Blue](#)

ERP/2020/recB: The ERPB recommends developing standards, business and technical requirements as appropriate, leading to interoperable specifications that ensure consumer selection of preferred payment instrument (card payment or SCT Inst) to conduct a payment transaction at the POI (physical or virtual POI) based on the ERPB document on specifications to enable consumer selection of preferred payment instrument (ERP/2020/027).

Addressed to: MSG MSCT

Status: A joint Task Force between the MSG MSCT and the ECSG was established in March 2021 that developed a document on *Business requirements for the consumer selection of preferred payment instrument at the POI* where both physical and virtual POIs have been covered. This document has been submitted to the ERPB meeting of 25 November 2021 and published on the EPC and ERPB websites. This recommendation could be further evaluated and addressed by the EPSG in view of their scope extension.

Assessment of follow-up: [Blue](#)

ERP/2019/recE: The ERPB recommends: (i) analysing the appropriateness of defining new services for SCT Inst, including pre-authorisation, recurring payments, refund, etc.; (ii) updating the SCT Inst rulebook to cover for these services as needed.

Addressed to: EPC

Status: In December 2019, the EPC received three change requests (CRs) from EuroCommerce. These change requests have been submitted to a public consultation as part of the SEPA payment schemes' 2020 change management cycle.

The outcome of the public consultation can be summarised as follows:

- the vast majority of scheme participants supported the EPC recommendation that these CRs cannot be part of the scheme and that the future SEPA Request-to-Pay (SRTP) scheme of the EPC can support these use cases;
- however, some other contributors favoured these CRs; they consider that such features should be part of the SCT Inst scheme rulebook and not just be limited to the SRTP scheme; they pointed out that

⁴ The European Card Stakeholder Group (ECSG) has been renominated as European Payments Stakeholder Group as of 20th March 2023, reflecting an updated mandate to expand the scope of its activities to cover also non-card retail payments.

otherwise service providers wishing to support such use cases would have to adhere to the SRTP scheme which would drive up costs and operational complexity.

Based on the outcome of the public consultation and the input provided by the relevant internal EPC working group and the two SEPA Payment Scheme Stakeholder Fora, the EPC Scheme Management Board meeting decided not to include these three CRs in the 2021 SCT Inst scheme rulebook.

In parallel, the EPC and EuroCommerce had two bilateral discussions dedicated to their three CRs.

The outcome of those discussions was that the use cases under the “Initial payment with unknown final amount” and “instalment payment” items might best be covered by the second version of the SRTP scheme planned to be published in November 2021, as suggested by the EPC.

As for the “refund” item, the EPC provided EuroCommerce with more information on the possibility already existing in the SCT Inst scheme to label an SCT Inst instruction as a ‘Repayment’ and agreed to investigate whether the pain.001 message supports the inclusion of the original SCT Inst instruction reference (as a consequence, also the inter-PSP pacs.008 message) as requested by EuroCommerce. The EPC’s investigation led to the conclusion that currently only the Remittance Information field in the pain.001 message would be suitable for the transport of such “Original Debtor/Originator Reference”.

Following this analysis, the EPC itself did not develop a concrete rulebook change request for the 2022 SEPA payment scheme rulebook change management cycle. Instead, the EPC took up clarifications about the use of the remittance information for such refunds in the next version of the clarification paper on SCT and SCT Inst rulebooks (EPC 131-17) which was published on 6 July 2021.

Assessment of follow-up: No further action needed at the level of the ERPB

ERPB/2019/recF: The ERPB recommends analysing the possibility of introducing a “Confirmation of payee” service in the context of the SEPA credit transfer schemes.

Addressed to: EPC

Status: In 2020, the EPC did a preliminary assessment of this matter and concluded that further analysing a possible inclusion of a “Confirmation of Payee” (CoP) functionality into the SEPA payment schemes through the regular SEPA payment scheme rulebook change management process would require comprehensive statistical evidence demonstrating the need and business case for such a functionality.

At that point in time, the EPC still lacked such comprehensive statistical evidence. There remained a dependency on the EBA/ECB payment fraud statistical reporting framework’s implementation for obtaining authorised push payment fraud data. Such quantitative data would be a key element to support a potential scheme change request to introduce a CoP functionality into the SEPA payment schemes through the 2024 SEPA payment scheme rulebook change management process.

In the second half of June 2022, the EPC started re-assessing this matter by doing a first high-level stock-taking exercise of CoP solutions already used or under development in some national communities at that point in time.

As of April 2023, the EPC accelerated its activities on a possible EPC CoP concept in view of the Proposal for a Regulation regarding instant payments published by the European Commission on 26 October 2022, whereby this regulatory proposal is now in a final negotiation phase at co-legislators’ level.

An extensive stock-taking exercise was held involving bilateral interviews with more than ten CoP schemes and solutions already or close to be implemented at national and international level. In mid-September 2023, the EPC agreed on a number of principles and next steps with respect to a possible EPC CoP concept:

- The EPC will develop a standalone CoP scheme, separate from any existing EPC payment or EPC payment-related schemes. This allows to use CoP service on top of any existing EPC payment and payment-related scheme in the future.
- The aim of this EPC CoP scheme is to guarantee interoperability at SEPA level between the different existing national solutions/ schemes. It will thus not replace existing solutions and

schemes. In SEPA countries where a CoP solution or scheme is not yet available or emerging, the EPC CoP scheme could facilitate the CoP needs of the SEPA countries concerned.

- The current intention is that the CoP scheme will rely on RESTful APIs built on a JSON format making use of ISO 20022 standard-based structures and XML message elements. Its feasibility needs further analysis.
- The current intention is to have a centralized Directory Service (at least at the start-up phase). The aim is to provide CoP end-points to PSPs making CoP requests, and the necessary level of authentication and security. This is necessary to guarantee SEPA level reachability within a rapid adoption timeline.
- The EPC aims to have a draft CoP scheme rulebook ready by end December 2023. It will then be published for a public consultation shortly after the final legislative text of the Regulation regarding instant payments is known.

Assessment of follow-up: **Yellow**

ERP/2019/rech: The ERPB recommends investigating the authentication models for strong customer authentication at physical POIs supported by the consumer's ASPSP when a PISP is involved and the related impact on the consumer's experience, compliant with legal requirements.

Addressed to: EC, EBA and other relevant stakeholders

Status: The European Banking Authority, in cooperation with the European Commission, developed an Opinion on obstacles under Article 32(3) of the regulatory technical standards on strong customer authentication and secure communication (published on 4 June 2020) which addresses a number of issues raised by market players, including mandatory redirection at the point-of-sale and the authentication procedures that ASPSPs' interfaces are required to support. In the Opinion, the EBA clarifies that "the method(s) of carrying out the authentication of the PSU (i.e. redirection, decoupled, embedded or a combination thereof) that ASPSPs should support will depend on the authentication procedures made available by the ASPSP to its PSUs and should support all these authentication procedures". The Opinion also states that "if the interfaces provided by ASPSPs do not support all the authentication procedures made available by the ASPSP to its PSUs, this would be a breach of Article 30(2) RTS and an obstacle under Article 32(3) RTS".

The EBA opinion addresses the aspect of compliance with legal requirements entailed in this recommendation. A follow-up opinion on supervisory actions to ensure the removal of obstacles to account access under PSD2 was published in February 2021, which prescribed NCAs to take action by April 30, 2021 and, in the event of encountered obstacles to set a deadline to respective ASPSPs to remove the obstacle(s). Some examples of supervisory actions are given and any obstacle identified should be removed within the shortest possible time and without undue delay. In the event that non-compliant ASPSPs do not remove any identified obstacles by the deadline set by the NCA, more effective supervisory measures should be taken⁵.

Moreover, the European Commission provided further clarity in the context of strong customer authentication requirements at the point of sale via responses to several questions received in the EBA's Q&A tool. Amongst others, the European Commission provided clarifications as regards the dynamic linking requirement (Q&A 2020_5247), the consumer's explicit consent to the PISP for processing of personal data (Q&A 2020_5570), and the information to be provided by the PISP to the payer prior to the initiation of the transaction (Q&A 2020_5573). The Commission addressed these issues in its proposal for a Payment Services Regulation (PSR), aimed to repeal the 2nd Payments Services Directive.

The EBA Q&A answers mentioned above have been taken into account by the MSG MSCT during the development of the document on *Interoperability of MSCTs based on NFC or BLE (EPC287-23)* for those MSCT use cases involving a PISP. The MSG MSCT is also preparing in view of these EBA answers the

⁵ While outside of the scope of this recommendation, it is noted that in 2023, ETPPA has collected and [published](#) a list of remaining obstacles in several member states and called upon the authorities to apply the required enforcements.

necessary updates to the MSCT use cases involving a PISP which are contained in the MSCT Implementation Guidance (EPC269-19v2.0) in preparation of the next release of the document.

Assessment of follow-up: No further actions at the level of the ERPB

ERPB/2019/recI: The ERPB recommends investigating the provisioning of access to all mobile device features (e.g. the contactless interface) in order to ensure that the consumer can choose between payment applications from different mobile payment providers, independently of the mobile device and the operating system used.

Addressed to: Competition authorities, mobile device manufacturers, mobile operating systems developers and GSMA/MNOs.

Status: On 16 June 2020 the European Commission (DG-Competition) opened antitrust investigations, inter alia, into practices regarding access to mobile device's contactless interface (NFC) by Apple. On 2 May 2022, the Commission sent a Statement of Objections informing Apple of its preliminary view that Apple abused its dominant position in mobile wallet markets on iOS devices and restricted competition by limiting access to the NFC technology. Apple examined the documents in the Commission's investigation file, replied in writing and request an oral hearing which took place in February 2023. A Statement of Objections is a formal step in an antitrust investigation which does not prejudge the outcome. In addition, the Digital Markets Act, which was published in the Official Journal on 12 October 2022, will have a direct effect on access to NFC for mobile payments. It will require companies designated as gatekeepers to ensure effective interoperability with hardware and software features they use themselves in their ecosystems. On 6 September 2023, the European Commission designated Apple as a gatekeeper with respect to its core platform service, i.e. its operating system. The Apple Pay investigation will inform the future application of the Digital Markets Act with regard to the analysis of the security concerns and effective and proportionate access to NFC.

Assessment of follow-up: Yellow

ERPB/2019/recJ: The ERPB recommends coordinating in cooperation with the instant payments at POI service providers an institutional communication campaign of the ERPB members to increase the familiarity with instant payments at POI solutions (in-store and e- and m-commerce). The communication campaign should result in the creation and distribution of informative material on instant payments at POI payment solutions to all ERPB members and affiliates. Moreover, ERPB members and the ECB are requested to make the informative material produced available on their websites.

Addressed to: EPC, consumer and retailers' associations, public sector

Status: The ERPB (July 2022) launched a work stream on communication with end users on instant payments with a view to reporting to the November 2022 ERPB meeting on a high-level communication strategy that will potentially be deployed in the EU, including what key messages to convey, considering ongoing developments, the stakeholders involved, the means of communication and the roll-out timeline. The ERPB (November 2022) supported the recommendation by the workstream to defer the launch of a communication campaign until after the European Commission's legislative proposal on instant payments would have been adopted and the key messages have been adapted where necessary to avoid potential confusion due to possible inconsistencies with the future legal framework.

Assessment of follow-up: NA*

**the deadline for this recommendation was mid-2021, however, subject to ERPB approval the recommendation will be reopened to facilitate further work warranted when the legislation is finalised.*

ERPB/2020/recC: The ERPB recommends evaluating the outcome of the following:

- the clarifications to be provided by the EBA Q&A tool on the various questions related to the framework for interoperability of instant payments at the POI (ERPB/2020/026) and its Annex 1 that have been coordinated with and entered by the MSG MSCT;
- the additional services for instant SCTs included in Recommendation ERPB/2019/recE in the ERPB Statement of November 2019;
- the development of a recognition label as recommended in Recommendation ERPB/2019/recA in the ERPB Statement of November 2019;
- the deliverables developed as per Recommendation ERPB/2020/recA

- the market situation in the light of other on-going initiatives with respect to the establishment of an interoperability framework for instant payments at the POI. At the same time the current document would be updated as appropriate.

The ERPB (July 2022) supported assessing whether to conduct further work on the remaining elements of an interoperability framework during its November 2022 meeting, taking into account the progress of the work at MSG MSCT level, alongside ongoing market developments and initiatives taken by European public authorities.

Addressed to: Group with multi-stakeholder participation

Status: NA*

Assessment of follow-up: No further immediate action in the remit of the ERPB if the EPC MSG MSCT recommendation to hold on the further work on the interoperability framework

**the timing for this recommendation was June 2021 to November 2021*

ERPB recommendations related to the next steps in the development of the QR code standard for instant payments (adopted in November 2021)

ERPB/2021/recB: The ERPB recommends submitting the final version of the “generic QR code standard” in an appropriate format through a fast-track procedure to an international standardisation body such as the International Organization for Standardization (ISO)/TC 68/SC 9 or the European Committee for Standardization (CEN).

Status: The MSG MSCT prepared a document in ISO format on Specifications of QR-codes for (instant) credit transfers⁶ (EPC193-22) based on EPC024-22 (see ERPB/2021/recA above), which the EPC submitted to ISO TC 68 SC 9 through a fast-track procedure on 29 September 2022.

Following the analysis of the comments received through internal informal ISO TC 68 SC 9 ballots, the MSG MSCT made some updates to the document which resulted in the version 1.2 that was published on the EPC website on 10 January 2023. Also an additional justification document was provided to support the fast track procedure. On 26 April 2023 the ISO TC 68 SC 9 opened a formal DIS⁷ ballot on the document. The DIS ballot closed on 19 July 2023 with the rejection of the standardization proposal by SC 9. Therefore, and as previously agreed with the ERPB and the EC, the EPC started a liaison process with CEN, and after introducing some limited and necessary changes to the QR code standard (e.g. on the basis of technical comments received during the DIS ballot), will submit it to CEN for approval. The expected timeline is no less than 12 months.

Assessment of follow-up: **Green**

ERPB recommendations on transparency for retail payments end-users (adopted in June 2021, impact assessment finalised in July 2022)

ERPB recommendations on transparency for retail payments end-users made in June 2021

Following adoption of the recommendations on transparency for retail payments end-users an impact assessment was conducted. Therefore, the recommendations listed below are based on those listed in the impact assessment.

ERPB/2021/rec1: It is recommended that each payee consistently uses its commercial trade name and that this name is provided to all involved parties in the payment chain for use in client’s payment account statements.

Addressed to: Payees, payees’ PSPs, payers’ PSPs, processors and payment schemes

Status: E-commerce Europe launched with its members at the end of October the same survey that Eurocommerce used. In the meantime, it continues to emphasise the importance of the guidelines on transparency, recently, in particular, in connection with the transparency proposals in the draft Payment Services Regulation. EuroCommerce launched a survey on 18 September 2023 with member associations and merchant members on the transparency recommendations. First results from this survey are starting to be provided. Further input is expected around the time of the November ERPB meeting. This follows a

⁶ Not necessarily SCT or SCT inst.

⁷ Draft International Standard

series of periodic campaigns explaining the recommendations to member associations. As well as generally reinforcing awareness of the recommendations, they have also asked them to take further action on a national level and inform the members as there are also national differences in some details. As EuroCommerce does not cover the entire retail community, they also reached out to other merchant representative organisations such as IATA, HOTREC, E-Commerce Europe, Independent Retail Europe and SMEUnited, with whom they have formed a Merchant Payments Coalition Europe. In addition, they asked company members to instruct their PSPs to ensure that the fields for Commercial Trading Name and Location are filled with a name or brand that consumers will recognise for each of their merchant IDs. In particular for cross border transactions, include merchant country wherever possible. They likewise asked organisation members to inform their members to instruct their PSPs to ensure the fields for Commercial Trading Name and Location are filled with a name or brand that consumers will recognise for each of their merchant IDs. In particular for cross border transactions, include merchant country wherever possible. The ECSAs noted that one community had reported that the local card scheme has amended its internal rules to ensure that all PSPs comply with the ERPB transparency requirements. The enrolment process for new merchants has been redefined by PSPs and commercial trade names are now being requested. PSPs have reviewed their existing merchants' database and they contain the needed information. They now confirm that the requested information is being carried out through the payment transaction chain, including authorisation, transaction, dispute (if any) and receipt provided to the account holder. There was a concern about e-commerce merchants with dynamic descriptor (those that might have multiple websites and might use different commercial names) and validations have been made to ensure that the correct information is also being taken into consideration (i.e. for the disputes process). The EDPIA reports that the process to educate the merchants about the importance of including/using the commercial name by default is ongoing. One important action is to take advantage of the periodical merchant/acceptor contract update to insert in the contract a section underlining the importance of providing, in the commercial name field, the name that is relevant for the merchant's customer. Another action consists in sending them emails to raise their attention on the issue.

Of the schemes, the EPC has published a guidance document dedicated to transparency requirements (<https://www.europeanpaymentscouncil.eu/document-library/guidance-documents/guidance-improve-transparency-retail-payment-end-users>) and requested its members to explain to payees how to make use of the existing datasets and attributes to provide more clarity to the payer about the "whom", "where" and "when" of a SEPA payment as required by the Recommendation. In addition, the latest version of the SRTP scheme rulebook advises that "a Payee should include its own legal name and its commercial trade name if different from legal name, and the ultimate payee's legal name and the commercial trade name if different from its legal name, in any RTP transaction it presents to the Payer", while further investigation into future needs is being carried out due to the increasing number of actors in payments chains. The EPSG provided information on updates to the Volume. In particular, books 2, 6 and 7 have been updated to facilitate implementation of the transparency recommendations. The PISPs report that no action is required by them as no changes are required.

Assessment of follow-up: Yellow

ERP/2021/rec2: It is recommended that each payee consistently uses its commercial trade name and that this name is provided to all involved parties in the payment chain for use in client's payment account statements.

Addressed to: Payees' PSPs, payees (and processors, although included in the category payees PSPs)
Status: E-commerce Europe launched with its members at the end of October 2023 the same survey that EuroCommerce used. In the meantime, it continues to emphasise the importance of the guidelines on transparency. Recently it did so in particular in connection with the transparency proposals in the draft Payment Services Regulation. EuroCommerce launched a survey on 18 September with member associations and merchant members on the transparency recommendations. First results from this survey are starting to be provided. Further input is expected around the time of the November ERPB meeting. This follows a series of periodic campaigns explaining the recommendations to member associations. As well as generally reinforcing awareness of the recommendations, they also asked them to take further action on a national level and inform the members as there are also national differences in some details. As EuroCommerce does not cover the entire retail community, they also reached out to other merchant representative organisations such as IATA, HOTREC, E-Commerce Europe, Independent Retail Europe and SMEUnited, with whom they have formed a Merchant Payments Coalition Europe. The ECSAs advised that one community reported that the local scheme, after adopting rules needed to comply with ERPB requirements is constantly carrying out monitoring actions and these do not seem to have identified any relevant failures. Additionally, some PSPs take into account the geolocalisation references and within the

web and their apps show the location of the merchant together with the transaction data, so the account holder can recognize where the purchase took place. Claims from customers due to lack of identification of the merchant are close to zero. Processors, suggest limitations to their role, but can support large merchants during onboarding to use a consistent commercial trade name at all stages of set-up. The PISPs report that PISPs provide Merchants with the tools required to introduce and update their commercial names as they appear in the payment transaction, i.e. PISPs get the Merchant name from the configuration tool to "write" it in the initiation request.

Assessment of follow-up: **Yellow**

ERP/2021/rec3: It is recommended that each payee consistently uses its commercial trade name and that this name is provided to all involved parties in the payment chain for use in client's payment account statements.

Addressed to: Processors

Status: Processors are examining whether there is any possibility for information they process to be lost in the processing, no evidence has so far been found. Monitoring is ongoing and no evidence has emerged to suggest that the merchant's trade name is being replaced with any other name or being deleted. A reinforcement of the monitoring during the update and transition to production of new software versions is ongoing to avoid an accidental deletion of the commercial name.

Assessment of follow-up: **Yellow**

ERP/2021/rec4: Include commercial trade name of both ultimate payee and of intermediary platforms when necessary. Special keywords such as "booked via", "your order from", "payment processed for" may be used.

Addressed to: Payees' intermediary platforms

Status: E-commerce Europe launched with its members at the end of October 2023 the same survey that Eurocommerce used. In the meantime, it continues to emphasise the importance of the guidelines on transparency, recently, in particular, in connection with the transparency proposals in the draft Payment Services Regulation.

Assessment of follow-up: **Yellow**

ERP/2021/rec5: Use standards and applications suitable for including identified data sets "end-to-end". Upgrade or change these standards when necessary.

Addressed to: Payees, payees' PSPs, payers' PSPs, processors and payment schemes

Status: E-commerce Europe launched with its members at the end of October 2023 the same survey that Eurocommerce used. In the meantime, it continues to emphasise the importance of the guidelines on transparency, recently, in particular, in connection with the transparency proposals in the draft Payment Services Regulation. EuroCommerce launched a survey on 18 September 2023 with member associations and merchant members on the transparency recommendations. First results from this survey are being provided. Further input is expected around the time of the November ERPB meeting. This follows a series of periodic campaigns explaining the recommendations to member associations. As well as generally reinforcing awareness of the recommendations, they also asked them to take further action on a national level and inform the members as there are also national differences in some details. As EuroCommerce does not cover the entire retail community, they also reached out to other merchant representative organisations such as IATA, HOTREC, E-Commerce Europe, Independent Retail Europe and SMEUnited, with whom they have formed a Merchant Payments Coalition Europe. The ECSAs noted that one community had reported that the local card scheme has amended its internal rules to ensure that all PSPs comply with the ERPB transparency requirements. The enrolment process for new merchants has been redefined by PSPs and commercial trade name is now being requested. PSPs have reviewed their existing merchants' database and they contain the needed information. They now confirm that the requested information is being carried throughout the payment transaction chain, including authorisation, transaction, dispute (if any) and receipt provided to the account holder. There was a concern about e-commerce merchants with dynamic descriptor (those that might have multiple websites and might use different

commercial names) and validations have been made to ensure that the correct information is also being taken into consideration (i.e. for the disputes process).

Of the schemes, the EPC has published a guidance document dedicated to transparency requirements (<https://www.europeanpaymentscouncil.eu/document-library/guidance-documents/guidance-improve-transparency-retail-payment-end-users>) and requested its members to explain to payees how to make use of the existing datasets and attributes to provide more clarity to the payer about the “whom”, “where” and “when” of a SEPA payment as required by the Recommendation. In addition, the latest version of the SRTP scheme rulebook advises that “a Payee should include its own legal name and its commercial trade name if different from legal name, and the ultimate payee’s legal name and the commercial trade name if different from its legal name, in any RTP transaction it presents to the Payer”, while further investigation into future needs is being carried out due to the increasing number of actors in payments chains. The EPSG provided information on updates to the Volume. Books 2, 6 and 7 have been updated to facilitate implementation of the transparency recommendations. Processors note that, any action to update the standards would only be possible through a collaboration with the whole ecosystem (cards schemes, PSPs, payments schemes). However, they are deploying the necessary changes following the EPC guidelines issued on 25 May 2022 (see further update under recommendation 1) and they are involved in the EPSG activities to update the Volume with transparency-related requirements (see recommendation 1 for the current state of play). The PISPs report that this recommendation is not applicable to them because they only process account to account payments.

Assessment of follow-up: Yellow

ERP/2021/rec6: Indicate exact geographical location where a physical purchase was made.

Addressed to: Payees

Status: E-commerce Europe launched with its members, at the end of October 2023, the same survey that Eurocommerce used. In the meantime, it continues to emphasise the importance of the guidelines on transparency. Recently, it did so in particular, in connection with the transparency proposals in the draft Payment Services Regulation. EuroCommerce launched a survey on 18 September 2023 with member associations and merchant members on the transparency recommendations. First results from this survey are being provided. Further input is expected around the time of the November ERPB meeting. This follows a series of periodic campaigns explaining the recommendations to member associations. As well as generally reinforcing awareness of the recommendations, they also asked them to take further action on a national level and inform the members as there are also national differences in some details. As EuroCommerce does not cover the entire retail community, they also reached out to other merchant representative organisations such as IATA, HOTREC, E-Commerce Europe, Independent Retail Europe and SMEUnited, with whom they have formed a Merchant Payments Coalition Europe. In addition, they asked company members to instruct their PSPs to ensure that the fields for Commercial Trading Name and Location are filled with a name or brand that consumers will recognise for each of their merchant IDs. In particular for cross border transactions, include merchant country wherever possible. They likewise asked organisation members to inform their members to instruct their PSPs to ensure the fields for Commercial Trading Name and Location are filled with a name or brand that consumers will recognise for each of their merchant IDs. In particular for cross border transactions, include merchant country wherever possible.

Assessment of follow-up: Yellow

ERP/2021/rec7: Indicate commercial trade name as displayed on the website or the commercial trade name of the online merchant for online purchases. The merchant’s country should also be indicated whenever is possible.

Addressed to: Payees

Status: E-commerce Europe launched with its members at the end of October 2023 the same survey that Eurocommerce used. In the meantime, it continues to emphasise the importance of the guidelines on transparency, recently, in particular, in connection with the transparency proposals in the draft Payment Services Regulation. EuroCommerce launched a survey on 18 September 2023 with member associations and merchant members on the transparency recommendations. First results from this survey are starting to be provided. Further input is expected around the time of the November ERPB meeting. This follows a series of periodic campaigns explaining the recommendations to member associations. As well as generally reinforcing awareness of the recommendations, they also asked them to take further action on a national

level and inform the members as there are also national differences in some details. As EuroCommerce does not cover the entire retail community, they also reached out to other merchant representative organisations such as IATA, HOTREC, E-Commerce Europe, Independent Retail Europe and SMEUnited, with whom they have formed a Merchant Payments Coalition Europe.

Assessment of follow-up: **Yellow**

ERP/2021/rec8: Indicate relevant transaction date.

Addressed to: Payees, payees' PSPs and processors

Status: E-commerce Europe will launch with its members at the end of October 2023 the same survey that Eurocommerce used. In the meantime, it continues to emphasise the importance of the guidelines on transparency, recently, in particular, in connection with the transparency proposals in the draft Payment Services Regulation. EuroCommerce launched a survey on 18 September with member associations and merchant members on the transparency recommendations. First results from this survey are being provided. Further input is expected around the time of the November ERPB meeting. This follows a series of periodic campaigns explaining the recommendations to member associations. As well as generally reinforcing awareness of the recommendations, they also asked them to take further action on a national level and inform the members as there are also national differences in some details. As EuroCommerce does not cover the entire retail community, they also reached out to other merchant representative organisations such as IATA, HOTREC, E-Commerce Europe, Independent Retail Europe and SMEUnited, with whom they have formed a Merchant Payments Coalition Europe. According to the ECSAs, one community had reported that the local cards scheme has amended its internal rules to ensure that all PSPs comply with the ERPB transparency requirements. The enrolment process for new merchants has been redefined by PSPs and commercial trade name is now being requested. PSPs have reviewed their existing merchants' database and they contain the needed information. They now confirm that the requested information is being carried out through the payment transaction chain, including authorisation, transaction, dispute (if any) and receipt provided to the account holder. There was a concern about e-commerce merchants with dynamic descriptor (those that might have multiple websites and might use different commercial names) and validations have been made to ensure that the correct information is also being taken into consideration (i.e. for the disputes process). Processors reiterate that, any action to update the standards would only be possible through a collaboration with the whole ecosystem (cards schemes, PSPs, payments schemes). However, they are deploying the necessary changes following the updates to the EPC guidelines and are involved in the EPSG activities to update the Volume with transparency-related requirements. PISPs report that they cannot intervene in the transaction date and the authorization date as they are only initiating the payment as if they were the customer. i.e. they rely on the ASPSP for both the transaction date and the authorization date. In some instances, they can also write a requested execution date in the case of future dated payments or recurring payments but the actual execution date will be written by the ASPSP.

Assessment of follow-up: **Yellow**

ERP/2021/rec9: Indicate exact geographical location where a physical purchase was made.

Addressed to: Payers' PSPs

Status: The ECSAs note that one community had reported that the local cards scheme has amended its internal rules to ensure that all PSPs comply with the ERPB transparency requirements. The enrolment process for new merchants has been redefined by PSPs and commercial trade name is now being requested. PSPs have reviewed their existing merchants' database and they contain the needed information. They now confirm that the requested information is being carried out through the payment transaction chain, including authorisation, transaction, dispute (if any) and receipt provided to the account holder. There was a concern about e-commerce merchants with dynamic descriptor (those that might have multiple websites and might use different commercial names) and validations have been made to ensure that the correct information is also being taken into consideration (i.e. for the disputes process).

Assessment of follow-up: **Yellow**

ERP/2021/rec10: Proactively ensure that their scheme rules encourage all the relevant recommendations to the largest extent possible.

Addressed to: Payment schemes

Status: The EPC published a guidance document dedicated to transparency requirements (<https://www.europeanpaymentscouncil.eu/document-library/guidance-documents/guidance-improve-transparency-retail-payment-end-users>) and requested their members to explain to payees how to make use of the existing datasets and attributes to provide more clarity to the payer about the “whom”, “where” and “when” of a SEPA payment as required by the Recommendation. In addition, the latest version of the SRTP scheme rulebook advises that “a Payee should include its own legal name and its commercial trade name if different from legal name, and the ultimate payee’s legal name and the commercial trade name if different from its legal name, in any RTP transaction it presents to the Payer”, while further investigation into future needs is being carried out due to the increasing number of actors in payments chains. The EPSG provided information on updates to the Volume. In particular, books 2, 6 and 7 have been updated to facilitate implementation of the transparency recommendations.

Assessment of follow-up: **Yellow**