EUROPEAN CENTRAL BANK
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EUROSYSTEM

ERPB Secretariat

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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 ongoing[1]. 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. Overall, the follow-up on ERPB recommendations remains satisfactory. It is however noted that the implementation of the recommendations on transparency will require continued attention from the ERPB notably given the recent decision of the EPC Payment Scheme Evolution and Maintenance Working Group, which will delay the inclusion of the "commercial trade name" in EPC rulebooks until 2027 at least. 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 2025).

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[1]   The record of past recommendations deemed closed as is available at: https://www.ecb.europa.eu/paym/groups/erpb/shared/pdf/Record_of_past_ERPB_recommendations.pdf

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*
  - o efforts have been made on the given recommendation or issue by the relevant stakeholders but further – previously not planned – efforts may be needed *or*
  - o 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, recommendations and statements made in the past meetings of the ERPB have been followed up by the relevant stakeholders.

Work notably 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) submitted the standard to the European Committee for Standardization (CEN) TC-225 and withdrew it from ISO. In this regard, the EPC successfully applied as a liaison organisation to CEN, and after introducing some limited and necessary changes to the QR code standard is about to proceed with the submission of a New Work Item (NWI) to the CEN/TC-225 to start the standardisation process. The expected timeline for approval was by Q2 or Q3-2025, but the inclusion in the standard of additional use cases and requirements, as requested by some stakeholders, will introduce some delay. In addition, the EPC finalised its 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), publishing the report "interoperability of MSCTs based on NFC or BLE" (EPC287-22 v1.0).

Despite the work made, efforts are still required for the implementation of the recommendations on transparency for retail payments end-users endorsed by the ERPB in July 2021. In particular, the EPC Payment Scheme Evolution and Maintenance (PSEM) Working Group (WG) considered incorporating new attributes related to the into the four SEPA payment schemes. The public consultation, ended on 9 June 2024, supported the recommendation to include the new attributes. Two message elements of the current version of ISO2002 standard could temporarily host the "commercial trade name" until the migration of the SEPA schemes to an updated ISO 20022 version, which could include new defined "commercial trade name" attributes. However, some communities of PSPs would have been impacted by the temporary solution because they already use those two message elements. Therefore, despite the outcome of the public consultation, the PSEM WG decided not to select any of the message elements and abandoned the temporarily implementation of the recommendation. The PSEM WG supported instead that the EPC proceeds with the steady solution, submitting the formal change request to ISO 20022 to define dedicated message elements for the attributes of the commercial trade name of the payee and of the payee's reference party, for the relevant ISO 20022 standard-based XML messages under the four SEPA payment scheme rulebooks. This decision will delay the implementation of the ERPB recommendation up to 2027 at least. For this reason, the assessment for this recommendation has been changed to red as the PSEM WG decision implies no progress in the short term. The new version of the five EPC payment schemes and of SRTP will be published in November 2024 and will enter into force on 5 October 2025. Considering the dependence of other actors in the payments chain on schemes rules, this delay with incorporating a name field in ISO 20022 messages and EPC scheme messages, will likely retard the progress of others implementing changes necessary to achieve the full aims of the transparency recommendations.

For upcoming updates, the note on the status of past recommendations would also include the best practices on the environmental footprint of electronic retail payments endorsed by the ERPB in June 2024, as well as the recommended actions on fraud prevention and mitigation given their timeline. On the latter, the ERPB Secretariat is working on how to possibly bundle related recommendations to ensure an efficient process.

4. Detailed assessment of follow-up on ERPB statements, positions and recommendations[2]

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 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 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.In February 2024, EFIP members discussed the main results of the questionnaire sent to Member States in summer 2023, i.e. the number of complaints, the causes of IBAN discrimination and the national measures taken or planned to combat IBAN discrimination. Best practices from Member States and next steps were also discussed. The chairs of the national payment committees committed to keep the topic as a key priority on the committees' agendas and to take or support initiatives aimed at removing the remaining barriers to the acceptance of non-domestic IBANs. EFIP also supported a proposal to set up a dedicated workstream to regularly exchange information on the state of the IBAN discrimination, actions and progress. In November 2024, this workstream on IBAN discrimination started its work with the representatives of the member States.

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

The assessment of the recommendation should thus remain yellow.

Assessment of follow-up: <mark>Yellow</mark>

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.

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.

The first release of the Rulebook on the Verification of Payee (VOP), published on 10 October 2024 after the review phase following the public consultation process, is supporting LEI as an optional identifier that a VOP Requesting PSP may use in addition to name and IBAN, while executing a Verification of Payee on a legal entity beneficiary.

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:

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.

In its November 2023 meeting, the ERPB agreed to conduct preparatory work on a potential new activity related to EU digital identity in the retail payments use case. The ERPB organised a dedicated technical session on eID on 10 April 2024 to help understand whether the ERPB could play a potential role in this field by identifying the various payment use cases using digital id and the requirements from an industry perspective. The session included a presentation by the Commission on their work on the European digital identity wallet and presentations by representatives of the Large Scale Pilots (LSPs) relevant to the payments use case.
The amending European Digital Identity Framework Regulation has been published in the Official Journal on 30 April 2024 and enters into force on 20 May 2024. Currently, the European Commission is drafting implementing acts that will be adopted in batches, with the first batch being expected by end of the year.

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 the most recent update (ARF 1.4.0) was in May 2024. With the release of the ARF 1.3 on 7 March 2024, an open source reference implementation has been published as well The Commission published a second call for support for the implementation of the European Digital Identity Framework - the LSP on 7 May 2024, to further 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 call closed on 5 November 2024. This new call includes use cases on payments, travel, age verification and wallet for business use. The first round of LSPs started their work on 1 April 2023 and will run for 2 years.

The amending Regulation also includes a requirement for accepting the newly established European Digital Identity Wallets in the financial sector. In its June 2024 meeting, the ERPB considered what work activities could be undertaken, and by when, to assist the Commission in delivering the EUDIW and help ensure that it could facilitate enhanced security and efficiencies in the retail payments ecosystem. The ERPB agreed to further contemplate the creation of a new workstream on EU digital identity and retail payments based on progress of the ongoing pilot exercises, looking at the payments use case to better frame the anticipated impact on payments and the possible role the ERPB could play.

Assessment of follow-up: <mark style="background:#00ff00">Green</mark>

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: <mark style="background:#00ff00">Green</mark>

ERPB/2015/rec14: The ERPB recommends requiring mobile devices to be certified in accordance with the future "Smart Secure Platform" being developed by ETSI (see ERPB/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: <mark style="background:#00ff00">Green</mark>

ERPB/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.

To address the Commission's competition concerns, Apple has offered commitments[3], among them (excerpt): (i) to allow third-party mobile wallet and payment service providers to access and interoperate through a set of Application Programming Interfaces ('APIs') with the NFC functionality on iOS devices free of charge, without having to use Apple Pay or Apple Wallet. (ii) to apply the commitments to all third-party mobile wallet app developers established in the European Economic Area ('EEA'); (iii) To provide additional features and functionalities, including defaulting of preferred payment apps, access to authentication features such as FaceID and a suppression mechanism.

These commitments were market tested, improved, and were made binding by Commission Decision of 11 July 2024. A monitoring trustee has been appointed in August 2024, supervising implementation during the 10-year duration. A number of licences allowing to develop NFC wallets on iOS devices have meanwhile been granted under the commitments and development of these third-party mobile wallets is under way.

Assessment of follow-up: <mark>Yellow</mark>

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

ERPB/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 2018[4], 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 in 2019 to define key elements of a Scheme. On*

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[3] https://ec.europa.eu/commission/presscorner/detail/en/ip_24_282

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

23 November 2023, the EPC published v1.0 of the SPAA scheme's "Default Fees" on its website and on 30 November 2023 the SPAA scheme rulebook version 1.1. published on the EPC website became effective. Since 1 December 2023 interested participants can join the scheme. The next milestone will be to bring the scheme to a live market status. A new MSG, still to be endorsed, will be tasked with this work, starting presumably in Q1 2025.

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.

In October 2024, the MSG MSCT has published the third release of the "Mobile Initiated SEPA (Instant) Credit Transfer and technical Interoperability Guidance" and ended its activities.

Assessment of follow-up: `Blue`

ERPB/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.); (i) 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 ERPB/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 ERPB/2020/27. This recommendation could be further evaluated and addressed by the EPSG[5] in view of their scope extension.

Assessment of follow-up: `Blue`

ERPB/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 (ERPB/2020/027).

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[5] 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.

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

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 to develop a standalone CoP scheme (subsequently renominated VOP, Verification of Payee 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 VOP 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 VOP scheme could facilitate the VOP needs of the SEPA countries concerned.

- VOPscheme 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.

- EPC VOP scheme could rely on a "default" EPC Directory Service (EDS), 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.

On the basis of the above defined principles, the status of EPC developments is the following:

- The Verification of Payee (VOP) Scheme Rulebook and the "Recommendations for the Matching Processes under the VOP Scheme" have been published on 10 October 2024.

- The VOP API specifications (i.e. the "default" Inter-PSPs API specifications to support cross-border interoperability between VOP scheme participants) and an updated version of the API Security Framework (ASF) have been published on 31 October 2024.

- After issuing a Request for Proposal (RFP), the EPC selected a technical service provider, supporting the EPC in the design and operations of a "default" EPC Directory Service (EDS). The EDS is a key IT component for securing SEPA-wide reachability and interoperability between VOP scheme participants, and to support any API-based scheme.

- The EPC is working to provide further clarifications concerning VOP scheme Rulebook and API specifications; to define VOP scheme adherence practicalities; to facilitate interoperability among VOP scheme participants, potentially relying on a self-clarification process and on technical tools (API Sandbox, test catalogues…)

- The go-live of the scheme is expected on 5 October 2025.

Assessment of follow-up: <mark>Green</mark>

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.

To address the Commission's competition concerns, Apple has offered commitments[6], among them (excerpt): (i) to allow third-party mobile wallet and payment service providers to access and interoperate through a set of Application Programming Interfaces ('APIs') with the NFC functionality on iOS devices free of charge, without having to use Apple Pay or Apple Wallet. (ii) to apply the commitments to all third-party mobile wallet app developers established in the European Economic Area ('EEA'); (iii) To provide additional features and functionalities, including defaulting of preferred payment apps, access to authentication features such as FaceID and a suppression mechanism.

These commitments were market tested, improved, and were made binding by Commission Decision of 11 July 2024. A monitoring trustee has been appointed in August 2024, supervising implementation during the 10-year duration. A number of licences allowing to develop NFC wallets on iOS devices have meanwhile been granted under the commitments and development of these third-party mobile wallets is under way.

Assessment of follow-up: <mark>Yellow</mark>

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

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[6] https://ec.europa.eu/commission/presscorner/detail/en/ip_24_282

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.

In June 2024, the ERPB endorsed the high-level communication strategy towards end-users and invited relevant ERPB members to report back to the relevant meetings in 2025 to confirm the commencement (roll-out) of the communication campaigns at national level. For euro area countries, communication should precede the compliance deadline set out in the Instant Payments Regulation (e.g. October 2025 for sending instant payments). Planning should commence in Q1 2025,

Assessment of follow-up: <mark style="background-color: #00FF00">Green</mark>

ERPB members are required to conduct the communication campaign and report back to the ERPB during 2025 to confirm the commencement of communication effort.

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.

In October 2024, the MSG MSCT has published the third release of the "Mobile Initiated SEPA (Instant) Credit Transfer and technical Interoperability Guidance" and ended its activities.

Addressed to: Group with multi-stakeholder participation

Status: NA*

Assessment of follow-up: No further action

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 transfers[7] (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 DIS[8] 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, which has been finalised in March 2024. After introducing some limited and necessary changes to the QR code standard, (e.g. on the basis of technical comments received during the ISO DIS ballot), the EPC has prepared, according to the CEN procedures, a New Work Item (NWI) proposal has been submitted to CEN/TC-225 for a 2-months balloting.

However, at a recent meeting of the CEN TC 225, two proposals extending/amending the scope of the current EPC QR-code standard document have been presented by two market participants..

According to the current schedule, the standard is forecasted to be published by Q2- or Q3-2025 (the minimum realistic time for standardisation at CEN being 68 weeks or 16 months from NWI submission approval), pending further analysis on the above listed extensions/amendments of the current EPC standard.

Assessment of follow-up: <mark>Green</mark>

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. Since the adoption of these recommendations the revised text for the PSD2 include enhanced transparency recommendations.

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 has received no additional comments or feedback on the implementation process since the last update when , it was continuing to emphasise the importance of the guidelines on transparency, in particular, in connection with the transparency proposals in the draft Payment Services Regulation. EuroCommerce has explained to its members what the PSR will demand of them with respect to the inclusion of the commercial trade name in payment messages. This follows a survey (launched in Q3 2023) and a 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

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[7] Not necessarily SCT or SCT inst.

[8] Draft International Standard

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). With regard to payer's PSPs two communities reported that this is already current practice. The commercial trade name is always requested and provided, as per Scheme rules, and since onboarding. One community reported that not necessarily, the fields in actual payment account statements allows to accommodate and show the commercial trade name of the payee and other relevant information, and also accessible in the digital channels. Another community reported that it provides information in original form, via statement in form asked by clients, camt 053 included (in full version of info provided).The EDPIA reports that the process to educate the merchants about the importance of including/using the commercial name by default is on-going. 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. Based on work conducted by the Future-Proof Work Block, the EPC initiated a public consultation on change requests for SCT, SCT Inst, SDD Core and SDD B2B schemes on 12nd March 2024. To meet the ERPB recommendation related to the commercial trade name, the EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG) suggested incorporating new attributes related to the "commercial trade name" into the four SEPA payment schemes. The public consultation, ended on 9 June 2024, supported the recommendation to include the new attributes. Two message elements of the current version of ISO2002 standard could temporarily host the "commercial trade name" until the migration of the SEPA schemes to an updated ISO 20022 version, which could include new-defined "commercial trade name" attributes. However, some communities of PSPs would have been impacted by the temporary solution because they already use those two message elements. Therefore, despite the outcome of public consultation, the PSEM WG decided not to select any of the message elements and abandoned the temporarily implementation of the recommendation. The PSEM WG supported instead that the EPC proceeds with the steady solution, submitting the formal change request to ISO 20022 to define dedicated message elements for the attributes of the commercial trade name of the payee and of the payee's reference party, for the relevant ISO 20022 standard-based XML messages under the four SEPA payment scheme rulebooks. This decision will delay the implementation of the ERPB recommendation up to 2027 at least. The new version of the five SEPA EPC schemes and of SRTP will be published in November 2024 and will enter into force on 5 October 2025.The new version of the SCT, SCT Inst, SDD Core and SDD B2B schemes will be published in November 2024 and will enter into force on 5 October 2025. The new attributes on the payee commercial trade name cannot be included in the schemes in the absence of a dedicated field for the commercial trade name. A change request will be submitted to ISO to include such new fields in payment messages.

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 work to update books 2 and 7 has been completed. Book 6 is currently undergoing a complete revision, which is why the Expert Team responsible for its management has only recently finalised the additions regarding transparency. The changes will have to be approved first by the EPSG Volume Subgroup (VOLSG) and then, by the EPSG Board.In parallel, the EPSG is updating the Volume glossary and definitions with many changes, not only those required by the ERPB transparency recommendations but also those derived from regulations

currently under discussion such as the PSR. All the changes will be part of the version that will be published next year for public consultation.

The PISPs report that no action is required by them as no changes are required.

Assessment of follow-up: <mark style="background-color:red;color:white">Red</mark>

ERPB/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 has received no additional comments or feedback on the implementation process since the last update when it was continuing to emphasise the importance of the guidelines on transparency, in particular, in connection with the transparency proposals in the draft Payment Services Regulation. EuroCommerce has explained to its members what the PSR will demand of them with respect to the inclusion of the commercial trade name in payment messages.. 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. One community reported that it automatically checks external sources for the payee's commercial trade name and when it finds out differences, it immediately contacts each payee to get its correct trade name. Another community reported that the trade name is on the merchant's ticket and in all payment exchanges (between issuer and acquirer). In all issuer-buyer exchanges: trade name, date and location are exchanged. The information is available to the issuer in case they want to provide it to the cardholder and what we show the cardholder is what the schemes ask us for. The same community reported that an obligation to update their commercial trade name in relevant data fields whenever such changes are required is in the contract signed by the merchant. One community reported that its customers can update information by themselves or request an update via electronical form. Another community reported that there is no tool, but an obligation for the payee to inform its PSP.
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: <mark style="background-color:red;color:white">Red</mark>

ERPB/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: <mark style="background-color:red;color:white">Red</mark>

ERPB/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: <mark style="background-color: red">Red</mark>

ERPB/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 has received no additional comments or feedback on the implementation process since the last update when it was continuing to emphasise the importance of the guidelines on transparency, in particular, in connection with the transparency proposals in the draft Payment Services Regulation. This follows a survey launched in Q3 2023 and 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. Nevertheless, a significant obstacle to further progress has been identified – new field for the commercial trade name will be needed to be added to payment messages under ISO 20022. This will take at least a year to implement, while the updates to EPC schemes will take a similar amount of time. 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: <mark style="background-color: yellow">Yellow</mark>

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

Addressed to: Payees

Status: E-commerce Europe has received no additional comments or feedback on the implementation process since the last update when it was continuing to emphasise the importance of the guidelines on transparency, in particular, in connection with the transparency proposals in the draft Payment Services Regulation. This follows a survey launched in Q3 2023 and 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: Red

ERPB/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 has received no additional comments or feedback on the implementation process since the last update when it was continuing to emphasise the importance of the guidelines on transparency, in particular, in connection with the transparency proposals in the draft Payment Services Regulation.   This follows a survey launched in Q3 2023 and 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: Red

ERPB/2021/rec8: Indicate relevant transaction date.

Addressed to: Payees, payees' PSPs and processors

Status: E-commerce Europe has received no additional comments or feedback on the implementation process since the last update when it was continuing to emphasise the importance of the guidelines on transparency, in particular, in connection with the transparency proposals in the draft Payment Services Regulation.   This follows a survey in Q3 2023 and 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: <mark>Red</mark>

ERPB/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). One community reported that it informs its clients about the place and date of each transaction with identification of the payment service provider. Another community reported that it was not necessary to adapt any template as all relevant information is available in the payment account/card account statements, and also in digital channels.

Assessment of follow-up: <mark>Red</mark>

ERPB/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. Based on work conducted by the Future-Proof Work Block, the EPC initiated a public consultation on change requests for SCT, SCT Inst, SDD Core and SDD B2B schemes on 12nd March 2024. To meet the ERPB recommendation related to the commercial trade name, the EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG) suggested incorporating new attributes related to the "commercial trade name" into the four SEPA payment schemes. All scheme participants must support the new attributes throughout their SEPA payment systems even though payment service users would still be free to use these elements or not. The public consultation ended on 9 June. The new version of the SCT, SCT Inst, SDD Core and SDD B2B schemes, published in November 2024 and entering into force on 5 October 2025, will not include a new field for the commercial trade name. A new field will be added when ISO 20022 messages are updated to include such name fields.

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 work to update books 2 and 7 has been completed. Book 6 is currently undergoing a complete revision, which is why the Expert Team responsible for its management has only recently finalised the additions regarding transparency. The changes will have to be approved first by the EPSG Volume Subgroup (VOLSG) and then, by the EPSG

Board.In parallel, the EPSG is updating the Volume glossary and definitions with many changes, not only those required by the ERPB transparency recommendations but also those derived from regulations currently under discussion such as the PSR. All the changes will be part of the version that will be published next year for public consultation.

Assessment of follow-up: Red