

Institution name	European Automated Clearing House Association (EACHA)
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1	European Automated Clearing House Association (EACHA)	5	2.1 ACTORS	General	General Comment	TIPS participation is open for parties eligible to open accounts in Target2. Therefore it is our understanding that Banks, Central Banks, and ACHs also can be Participants in TIPS, according to the TARGET2 Guideline - Annex II, Art. 4.2 (as far as ACHs are concerned, paragraph 2 states that "The [insert name of the CB] may, at its discretion, also admit the following entities as direct participants: [...] (d) entities managing ancillary systems and acting in that capacity"). This should be specified in the URD.
2	European Automated Clearing House Association (EACHA)	1	1.3 PROJECT SCOPE AND DESCRIPTION	General	General Comment	The URD states that "TIPS shall support Participants to be compliant with the SCT Inst scheme for instant payments in euro". The SCT Inst Scheme Rulebook specifies that CSMs supporting the SCT Inst scheme shall take the necessary measures to ensure interoperability with other CSMs. Also, the "Eurosystem expectations for clearing infrastructures to support pan-European instant payments in euro", state an expectation for infrastructures to be interoperable (in line with Regulation EU 260/2012). This obligation for compliant CSMs to be interoperable with each other, ensures that a bank will not be obliged to participate in more than one CSM in order to exchange SCT-inst payments with a bank that participates in another CSM. The URD document however, does not specify that TIPS shall be interoperable with other SCT-Inst compliant CSMs. Thus, it appears that although the TIPS solution claims to "support Participants to be compliant with the SCT Inst scheme" in practice the requirement by the SCT Inst Rulebook to ensure interoperability with other CSMs is not fulfilled. It is therefore proposed that the Eurosystem includes in the URD an additional requirement, for TIPS to be interoperable with other CSMs. This would make the TIPS solution also compliant with the Eurosystems expectations, and ensure a level playing field for TIPS and other Pan-European CSM solutions.