



**Electronic Money Association**

Crescent House

5 The Crescent

Surbiton, Surrey

KT6 4BN

United Kingdom

Telephone: +44 (0) 20 8399 2066

[www.e-ma.org](http://www.e-ma.org)

27 August 2021

Dear Sir/Madam

**Re: EMA response to [EPC Public consultation on possible changes to the SEPA Request to Pay scheme Rulebook](#)**

The EMA is the EU trade body representing electronic money issuers and alternative payment service providers. Our members include leading payments and e-commerce businesses worldwide, providing online payments, card-based products, electronic vouchers, and mobile payment instruments. Most members operate across the EU, most frequently on a cross-border basis. A list of current EMA members is provided at the end of this document.

I would be grateful for your consideration of our comments and proposals.

Yours sincerely,

A handwritten signature in black ink that reads 'Thaer Sabri'. The signature is written in a cursive style and is underlined with a long horizontal stroke.

Dr Thaer Sabri  
Chief Executive Officer  
Electronic Money Association

Item	CR#	Contributor	Change request title	EPC RTP TF recommendation	Do you support the EPC RTP TF recommendation?	Comments regarding (non-)support of the EPC RTP TF recommendation
I	I	EPC RTP TF	API requirements	Should be incorporated into the scheme - option b		
I	I		Standardisation		YES	
I	I		Architecture style orientation		YES	
I	I		Data encapsulation for the API payload			The EMA proposes to opt for Option 3 (the Mixed Option) listed in the CP with JSON used for the message envelope and XML used for the payment data payload. This approach offers the optimal balance of alignment with the ongoing trend in API design (use of JSON) and backwards compatibility (with ISO 20022 XML payment data structures).
I	I		Handling of long-lasting interactions			The EMA proposes to opt for Option 2 (the "Asymmetric Option" in the CP). A call back mechanism should be defined during the API design phase to allow asynchronous message exchanges/communications between SRTP Scheme participants.

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1	1		Identification of SRTP SPs		YES	We agree with the proposed approach (to identify SPs) <u>as long as</u> the Scheme Manager & the TF ensure that the acceptable identifiers are accessible to all intended Scheme Participants. Many future SRTP scheme participants do not hold a PSD2-compliant eIDAS certificate.
1	1		Identification of other parties ("hubs")			<p>The EMA considers that intermediate parties involved in the exchange of SRTP messages (e.g. communication hubs) should be identified. The role of these parties could be described as TSPs (Technology Service Providers) and they need not be scheme participants themselves.</p> <p>It would be useful to confirm whether intermediate parties need to complete the Scheme Homologation process .</p>
1	1		Authentication of parties (during transport)		YES	<p>The EMA proposes to support the use of TLS 1.3 onwards and of the crypto algorithms (and associated key sizes) supported by TLS v1.3.</p> <p>The EMA does however remain concerned about the requirement for every SRTP participant to source an eIDAS, PSD2-</p>

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						<p>compliant certificate; this will not be a trivial exercise and carries associated costs, particularly for those participants that are not regulated.</p> <p>We note the expectation that communicating parties will be mutually authenticated. We welcome further clarity regarding how intermediate parties should be authenticated as part of this process.</p>
1	1		Parties' roles			<p>We understand that the SP role validation should happen separately from the SP authentication, and therefore the SP Role data element has not been included in the certificate envelope. However, we suggest that the two steps should be linked in some capacity for security reasons.</p> <p>We note that references to a Live SRTP Participants' Register that will be maintained by the EPC. We welcome further clarity regarding whether the register will be polled on a real-time basis as part of the process of validating the originator of SRTP message exchanges.</p> <p>In addition to the Payer/Payee SP roles,</p>

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						<p>additional roles will need to be introduced to identify intermediaries that provide on-behalf services to the former (comms hubs, message exchanges, API service aggregators, address lookup/routing service providers etc.) and do not have a relationship with the Payee/payer. The latter may be all categorised as TSPs (technology service providers).</p>
I	I		Payload integrity, non-repudiation		NO	<p>The use of the QSealC digital signature process to ensure message payload integrity <u>remains optional</u> for many PSD2 XS2A APIs. In this context, it is unclear why the SRTP TF would consider making its use <u>mandatory</u> for a non-payment messaging scheme. As mentioned earlier, the availability and cost of sourcing an eIDAS certificate is likely to be a major exercise for many participants. According to proposals in the CP, SRTP scheme participants will actually have to source two eIDAS certificates (QWAC and QSealC), thus increasing the barrier to joining the scheme.</p>
I	I		Miscellaneous norms and standards (can depend		YES	<p>If the EPC (as Scheme Manager) adopt an operational role i.e. a readable directory of participants and the API end points, then this naturally competes with possible market</p>

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			on decisions above), styling, etc...			providers.  However, if there are no commercial service providers willing to take on the Scheme Manager operational tasks outlined in this part of the CP, it would make sense to have EPC take on the delivery of these tasks to enable the Scheme to launch.
2	2	Finance Finland/Finnish Banking Community	Addition of a URL	Should be included in the scheme as an optional feature - option c	YES	
3	3	Finance Finland/Finnish Banking Community	Redirection	Should be incorporated into the scheme - option b	YES	Support the name change and broader scope of this item.
4	4	Finance Finland/Finnish Banking Community	Currency agnosticism	Should be included in the scheme as an optional feature - option c	YES	
5	5	Finance Finland/Finnish	Use of an Alias/Proxy	Cannot be part of the scheme for one	YES	

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		Banking Community		of the following reasons: it is out of scope of the Scheme - option e		
6	6	Finance Finland/Finnish Banking Community	Include the rationale on how to route the RTP message to the correct Payer's RTP SP	Should be incorporated into the scheme - option b		
6	6		Enrolment of the Payee		NO	<p>Enrolment of the Payee is a commercial arrangement between the payee and the RTP SPs that they choose to operate with. The RTP scheme should not require additional standards of payee verification that the RTP SP would have to perform. The SRTP SPs as members of the Scheme are the trusted parties, and will have been identified and certified when on-boarded to the Scheme (whether regulated entities or not).</p> <p>Directory service providers (providing registration and look-up directory services to multiple RTP SPs) may emerge in the market place. Payee RTP SP's should not be required to broadcast payee ID information, at on-boarding, to all RTP directories in the</p>

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						ecosystem as this is commercially sensitive information.
6	6		Enrolment of the Payer		YES	As per CR #19, optional payer on-boarding should be considered. Identification and authentication of the Payer for the purposes of providing the subsequent payment transaction is an entirely separate obligation for their PSP (who may/may not be the RTP SP).
6	6		De-enrolment		YES	
6	6		Activation initiated by the Payee		YES	
6	6		Activation initiated by the Payer		YES	
6	6		One off activation		YES	
6	6		Generic activation		YES	
6	6		Fraud / Trust issues			It is not clear from the question whether this is referring to trust between scheme participants, the scheme participant trust



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						framework, or trust between scheme participants and payer/payees?
6	6		Deactivation		YES	
7	7	EPC SEMSTF	Attribute AT-65	Should be incorporated into the scheme - option b	YES	
8	8	Spanish Banking Community	Request for instalment payments	Can be revisited for a future release of the SRTP rulebook - option f	YES	
9	9	Answer Pay Limited	Removal of inter-services provider references	Should be incorporated into the scheme - option b	YES	Agree this requirement should be further analysed in the context of CR#1; identification of other parties in particular.
10	10	NL Community	Re-direct option Request for payment guarantee	Should be incorporated into the scheme - option b Should be included in the scheme as an	YES	Guarantee - agree with the boundaries proposed that RTP scheme can only handle 'request' for guarantee. The actual payment guarantee is part of the subsequent payment initiation flow.

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				optional feature - option c		
11	11	Fundu Technology Oy	Recurring payments Request for instalment payments Addition of a URL	Can be revisited for a future release of the SRTP rulebook - option f Can be revisited for a future release of the SRTP rulebook - option f Should be included in the scheme as an optional feature - option c	YES	
12	12	EuroCommerce	Request for payment guarantee	Should be included in the scheme as an optional feature - option c	YES	
13	13	EuroCommerce	Request for instalment payments	Can be revisited for a future release of the SRTP rulebook - option f	YES	

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14	14	EuroCommerce	Notification of payment execution	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - option e	YES	
15	15	EuroCommerce	Payee's enrolment and Payer's activation	Should be incorporated into the scheme - option b	YES	
16	16	EuroCommerce	Pre-authorisation or deferred payments	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - option e	YES	
17	17	EuroCommerce	Indicate the underlying payment instrument associated to a SRTP message	Should be incorporated into the scheme - option b	YES	
18	18	Global Legal Entity Identifier	Use of a LEI	Cannot be part of the scheme for one	YES	

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		Foundation (GLEIF)		of the following reasons: it is out of scope of the Scheme - option e		
19	19	ETPPA	Payer's onboarding process	Should be incorporated into the scheme - option b	YES	
20	20	MSG MSCT	SCT reference in the SRTP message	Can be revisited for a future release of the SRTP rulebook - option f	YES	
21	21	DSGV on behalf of GBIC (German Banking Industrial Committee)	Attributes AT-05 and AT-41	Should be incorporated into the scheme - option b	YES	
22	25	Suggested change following the 2020 public consultation	Response time service level	Can be revisited for a future release of the SRTP rulebook - option f	YES	

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23	26	Suggested change following the 2020 public consultation	Remove Expiry Date/Time for Request for Status Update	Can be revisited for a future release of the SRTP rulebook - option f	YES	
24	27	Suggested change following the 2020 public consultation	Allow the Payer or the Payer's RTP SP to issue a Request for Cancellation	Can be revisited for a future release of the SRTP rulebook - option f	YES	
25	28	Suggested change following the 2020 public consultation	Send the Request for Status Update up to the Payer	Should be incorporated into the scheme - option b	YES	
26	29	Suggested change following the 2020 public consultation	Additional dataset for a Request for Cancellation reject	Should be incorporated into the scheme - option b	NO OPINION	
27	30	Suggested change following the 2020 public consultation	Include standard set of data elements for the exchange of fraud prevention and detection information/fraud score/contextual	Can be revisited for a future release of the SRTP rulebook - option f	YES	However, enhanced exchange of data to assist with fraud detection and prevention should be available to all PSPs using an EPC payment scheme, rather than confined to only those participating in the RTP scheme.

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			information in SRTP messages			
28	31	Suggested change following the 2020 public consultation	Insert the Extended RTP Remittance Information (ERI) in the payment (AT-05)	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - option e	YES	
29	32	Suggested change following the 2020 public consultation	Allow deviations from the generic SRTP flow	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - option e	YES	
30	33	Suggested change following the 2020 public consultation	When the Payer's RTP SP is also the Payer's PSP, the Payee's IBAN would be optional	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - option e	YES	
31	34	Suggested change following the	Allow the Payer to ask for changes on	Already provided for in the scheme: no	YES	

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		2020 public consultation	amount/execution date/method of payment	action is necessary for the EPC - option a		
32	35	Suggested change following the 2020 public consultation	New attribute to provide information on the Payee's type of party	Can be revisited for a future release of the SRTP rulebook - option f	YES	
33	36	Suggested change following the 2020 public consultation	Change the first Agreed Payment Date to the first payment date chosen by the Payer	Can be revisited for a future release of the SRTP rulebook - option f	YES	
34	37	Suggested change following the 2020 public consultation	Remove Conditional (C) from dataset DS-03	Should be incorporated into the scheme - option b	YES	
35	38	Suggested change following the 2020 public consultation	Add a sentence "The EPC strongly recommends adding a check-digit to the reference with an identical	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - option e	YES	

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			modulo/structure as the IBAN calculation”			
36	39	Suggested change following the 2020 public consultation	Provide bank-to-corporate reporting ('credit globalisation') guidance	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - option e	YES	
37	40	Suggested change following the 2020 public consultation	Addition of 'in the exceptional case of no response receive' in the Negative Response	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - option e	YES	
38	41	Suggested change following the 2020 public consultation	A field should be available to identify the type of request. Payment should be one of the options	Cannot be part of the scheme for one of the following reasons: it is out of scope of the Scheme - option e	YES	
39	42	Suggested change following the	Include a description of the SCT Inst flow	Already provided for in the scheme: no	YES	



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		2020 public consultation		action is necessary for the EPC - option a		
40	43	Suggested change following the 2020 public consultation	Include more description about the SRTP features and on how to instruct a SRTP message	Already provided for in the scheme: no action is necessary for the EPC - option a	YES	

## **EMA Members, as of August 2021**

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[Allegro Group](#)  
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