



EUROPEAN CENTRAL BANK

EUROSYSTEM

EPC Implementation Guidelines: clarifications and potential impact on TIPS SDDs for TIPS Release

R2023.NOV

TIPS-CG

ECB-UNRESTRICTED



05 July 2023

target | TIPS
services

Background

- As part of review of “TIPS-0052-SYS - Alignment of TIPS to the 2023 Version of the SCT Inst specifications and MyStandards migration”, [potential inconsistency](#) of the TIPS requirements compared to the EPC documentation were raised by an NCB. 4CB provided an [explanation on interpretation of TIPS](#).
- During the [review of DA](#) of the same CR later, [no comments](#) were received on this specific aspect.
- During the review of the TIPS SDDs, a TIPS-CG member provided [similar comments](#) and 4CB provided the interpretation of TIPS and which [documents are used as a baseline](#).
- In May 2023, an incident [INC000000377815](#) raised to address this issue

Impacted messages and fields*

Message	tag	Potential inconsistency
camt.056 (FIToFIPaymentCancellationRequest)	OrgnITxRef - ultimate debtor - OrgId	Only 'AnyBIC' (missing 'LEI' e 'other')
	OrgnITxRef - debtor - OrgId	Only 'AnyBIC' (missing 'LEI' e 'other')
pacs.004 (PaymentReturn)	OrgnITxRef - ultimate debtor - OrgId	Only 'AnyBIC' and 'other' (missing 'LEI')
	OrgnITxRef - debtor - OrgId	Only 'AnyBIC' and 'other' (missing 'LEI')
	OrgnITxRef - Creditor - OrgId	Only 'AnyBIC' and 'other' (missing 'LEI')
	OrgnITxRef - Ultimate Creditor - OrgId	Only 'AnyBIC' and 'other' (missing 'LEI')
camt.029 (ResolutionOfInvestigation)	OrgnITxRef - ultimate debtor - OrgId	Only 'AnyBIC' (missing 'LEI' e 'other')
	OrgnITxRef - debtor - OrgId	Only 'AnyBIC' (missing 'LEI' e 'other')
	OrgnITxRef - creditor - OrgId	Only 'AnyBIC' (missing 'LEI' e 'other')
	OrgnITxRef - Ultimate creditor - OrgId	Only 'AnyBIC' (missing 'LEI' e 'other')
Negative response to a recall / Response for Status Update on a recall		
pacs.028 Recall (FIToFIPaymentStatusRequest)	OrgnITxRef - ultimate debtor - OrgId	Only 'AnyBIC' (missing 'LEI' e 'other')
	OrgnITxRef - debtor - OrgId	Only 'AnyBIC' (missing 'LEI' e 'other')
	OrgnITxRef - creditor - OrgId	
<ul style="list-style-type: none"> - The Originator PSP or Instructing Party can start the investigation process on a previously instructed Instant Payment Transaction; - The Originator PSP or Instructing Party can start the Request for Status Update on a Recall previously instructed. 	OrgnITxRef - ultimate creditor - OrgId	Only 'AnyBIC' (missing 'LEI' e 'other')

* These are optional fields not used by TIPS in the processing of the related messages.

Current status of clarifications

- The **implementation guidelines (IGs) from** EPC are **not clear** and hence leads to **different interpretation by various participants**. While for the pacs.008 the IGs contain a clear indication of the need to include these fields in Ultimate Debtor, Debtor, Creditor and Ultimate Creditor, this not the case for camt.056, camt.029, pacs.004 and pacs.028 messages, for which this level of detail is not present in the IGs: the IGs contains different levels of details for different messages. Applying the ISO20022 customisation used by all the TARGET Services, TIPS removed these fields, since (i) not explicitly required by the EPC (no SEPA CORE or white shading fields) and (ii) not used in TIPS.
- Latvijas Banka informed 4CB that EPC confirmed via an email about the need of the inclusion of these fields in image and likeness of the pacs.008, even if this interpretation is general and not reflected in the IGs at XSD level.
- ECB approached EPC for clarifications citing the references to the IGs at XSD and value levels and requested for a clarification. It is suggested to EPC that the IGs will be updated to remove the ambiguity so that there is a clear baseline for all participants → **A response from EPC is expected earliest in the first week of July 2023.**

Potential impact (As is)

TIPS Inbound Messages:

- TIPS will not be able to process messages with the optional elements mentioned in the Slide 3 present at xml level and hence they will be rejected for schema validation error.

TIPS outbound Messages:

- Since rejected in inbound, for all the business case in which the messages should be forwarded by TIPS, this forwarding is not performed.

Possible outcomes and potential impact

Scenario 1: EPC confirms that the interpretation of TIPS is correct

- No changes to the TIPS documentation / software
- Participants that are **NOT aligned** with the interpretation of TIPS need to adapt their systems accordingly.

Scenario 2: EPC confirms that the interpretation of TIPS is not correct

- Potential update of EPC IGs in order to remove any kind of ambiguity.
- A written consultation with TIPS-CG / TIPS-WG on the clarifications provided by EPC. This ensures that there is a common understanding across participants. Once approved, the implementation timeline and scope needs to be planned.

Open Issues

Scenario 2

- ❑ In order to limit the impact / last minute changes and respective risks, it needs to be evaluated whether
- ❑ The issues reported should be fixed as part of November 2023 release or can be planned for post Nov 2023, considering also that these are optional fields not used as main elements for reconciliation.
- ❑ The expected usage of these fields by the TIPS CG members is sufficient to justify a short term change, considering that for some fields (e.g. Other or Private Id) the current status of TIPS specifications and of the EPC IGs are in place from TIPS go-live.
- ❑ Can we use the statistics on average monthly volumes of CAMT.056, PACS.004, CAMT.029, PACS.028 as proxy to estimate the impact?

Thank you for your attention!



TIPS@ecb.europa.eu

www.ecb.europa.eu/paym



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