

# **NPC CREDIT TRANSFER AND INSTANT CREDIT TRANSFER SCHEME RULEBOOKS PUBLIC CONSULTATION ON 2027 CHANGE REQUESTS**

NPC021-02 / Version 1.0 / Date issued: 15 March 2026

**Public**

## ABSTRACT

The Nordic Payments Council (“NPC”) is responsible for the development and maintenance of the NPC schemes. The NPC schemes are a set of rules, practices and standards to achieve interoperability for the provision and operation of a (instant) credit transfer agreed at interbank level for the currencies covered by the scheme (Scheme Currencies).

It is a key objective of the NPC that the NPC Credit Transfer (NCT) and Instant Credit Transfer (NCT Inst) schemes are able to develop with an evolving payments market. To meet the demands of the schemes’ participants and stakeholders, the NCT and NCT Inst schemes are subject to a change management process that is structured, transparent and open, governed by the NPC Scheme Management Rules. For details on the principles governing the NPC scheme change management process, we refer to sections 5, 6 and 7 in this document and the sources listed at the end of this page.

This **NPC 2027 Change Request Public Consultation Document** (document NPC021-02) details change requests for possible modifications to be introduced into the next versions of the NCT and NCT Inst rulebooks. This public consultation document builds on change requests submitted by stakeholder representatives, banking communities and by NPC Working and Support Groups. The NCT and NCT Inst 2027 Change Request Public Consultation Document offers the analyses and recommendations by the NCT & NCT Inst working group (WG) on the way forward regarding individual change requests. A summary overview of the change requests and related recommendations by the NCT & NCT Inst WG are provided in chapter 1 of this Change Request Public Consultation Document.

**The NPC submits the NCT and NCT Inst 2027 Change Request Public Consultation Document for public consultation. The public consultation takes place between March 15<sup>th</sup> 2026 and June 3<sup>rd</sup> 2026.**

All NPC participants and stakeholders are encouraged to provide feedback on the possible changes to be introduced into the next version of the NCT and NCT Inst rulebooks by completing the response template NPC009-10 on the available on the [NPC website](#) and **send it to [info@npcouncil.org](mailto:info@npcouncil.org) by June 3<sup>rd</sup> 2026 at 17h00 CET at the latest**. The NPC will not consider any feedback received after this deadline.

Proposed changes detailed in this NCT and NCT Inst 2027 Change Request Public Consultation Document will be taken forward if they are:

- broadly accepted by all NPC participants and stakeholders
- technically and legally feasible
- approved by the Scheme Management Committee (also known as SMC and is the decision-making body in charge of the schemes’ evolution in the NPC).

Others will not be retained.

The updated version of the NCT and NCT Inst rulebooks will be published in November 2026 and enter into effect in November 2027. In accordance with market best practice, payment service providers and their suppliers have at least one-year lead time to address rulebook updates prior to such updates entering into effect. In accordance with industry best practice, payment service providers and their suppliers have a 12 months lead time to address scheme rulebook updates prior to such updates taking effect.

More information about the maintenance and the evolution of the NCT scheme is available in Chapter 4 of the Scheme Management Rules being a binding Annex to the current applicable NCT rulebook.

Please refer to “Annex 1 – NCT\_NCT Inst Original CR documents” for the original detailed change requests. This document contains only a summary of each individual change request.

For all recommended change requests originating from EPC, we refer to [EPC's website](#) where they will be published on March 13<sup>th</sup> as part of EPC’s 2026 Public consultation change request referring to 2027 version of the SEPA schemes.

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# 1 Executive Summary: Major Change Requests to the NCT and NCT Inst Rulebook

## 1.1 NPC Approach

The principles governing the evolution of the Nordic Payments Council (NPC) payment schemes as set out in the NPC Credit Transfer (NCT) and NPC Instant Credit Transfer (NCT Inst) rulebooks, are detailed in the 'NPC Scheme Management Rules'. This document is available for download on the Nordic Payments Councils (NPC) website: [www.nordicpaymentscouncil.org](http://www.nordicpaymentscouncil.org). Sections 5, 6 and 7 in this NCT and NCT Inst 2027 Change Request Public Consultation Document detail the application of the Scheme Management Rules in the NPC scheme change management process.

NPC make a difference between so-called major and minor changes to the NPC scheme rulebooks. A major change is a change that affects or proposes to alter the substance of the scheme rulebooks and the schemes. Any change to chapters 5 and 6 of the scheme rulebooks is always considered a major change, if not editorial. A minor change is a change of an uncontroversial and usually technical nature that facilitates the comprehension and use of the scheme rulebooks.

This executive summary of the NCT and NCT Inst 2027 Change Request Public Consultation Document highlights change requests for major changes to the NCT and NCT Inst rulebooks received in this scheme change management cycle. Change requests for minor changes to the NCT and NCT Inst rulebooks are set out in chapter 4 of this Change Request Public Consultation Document.

All change requests to the NCT and NCT Inst rulebooks are submitted for public consultation between **March 15<sup>th</sup>, 2026, and June 3<sup>rd</sup>, 2026**. Information on how to share feedback with the NPC is included in the abstract of this Change Request Public Consultation Document and section 1.2.

The NPC received **3 change requests from the Nordic market** for major changes suggested to be introduced into the NCT and NCT Inst rulebooks. NPC working groups have proposed a further **4 internal major change requests** aimed at improving the schemes and fulfilling the requirements on the Nordic market.

NPC will also recommend that all changes suggested to be implemented in SEPA Credit Transfer Rulebook 2027 version, are being implemented in NPC Credit Transfer Rulebook 2027 version. This is in line with NPC's vision to always align with EPC SEPA Schemes as much as possible.

All original change requests are included in Annex 1 to this document. We refer to EPC's website of all EPC's original changes requests (will be published as part of EPC Public consultation change requests on March 13<sup>th</sup>).

All change requests have been categorised as follows:

- Minor change requests
- Major change requests

All major change requests include a detailed description, the contributor and the NCT & NCT Inst WG's analysis and recommendation. The minor comments are detailed with decision in Chapter 4.

All change requests have been reviewed by and include a recommendation from the NCT & NCT Inst WG unless the NCT & NCT Inst WG was not able to provide a recommendation for the public consultation. Each recommendation reflects one of the options detailed in items a) through f) below:

- a) The change is **already provided for** in the Scheme: no action is necessary for the NPC

- b) The change **should be incorporated into the Scheme**: the Change Request becomes part of the Scheme and the Rulebook is amended accordingly
- c) The change **should be included in the Scheme as an optional feature**:
  - The new feature is optional and the Rulebook will be amended accordingly;
  - Each Scheme Participant<sup>1</sup> may decide to offer the feature to its customers, or not.
- d) The change is not considered fit for Nordic wide use and **could be handled as an additional optional service (AOS)** by interested communities:
  - The proposed new feature is not included in the Rulebook or in the Implementation Guidelines released by the NPC related to the Rulebook;
  - The development of AOS is out of scope of the NPC. However, the NPC does publish declared AOS arrangements on the NPC Website for information purposes;
  - The NPC may consider the inclusion of AOS arrangements, if supported by a sufficient number of communities, in a future version of the Rulebook;
- e) The change request **cannot be part** of the existing scheme for one of the following reasons:
  - It is technically impossible or otherwise not feasible (to be explained on a case-by-case basis);
  - It is out of scope of the scheme;
  - It does not comply with the SEPA Regulation or any other relevant EU, Nordic or Swedish legislation.
- f) The change request may be considered for the development of a **new scheme**:
  - The change request reflects major changes which cannot be integrated into an existing scheme;
  - To develop the change request further, i.e. to develop a new scheme, the following requirements must be met:
  - The benefits of the new scheme for payment end users are demonstrated prior to the launch of the development phase;
  - It is demonstrated that a sufficient number of stakeholders will make use of the new scheme;
  - A cost-benefit analysis is provided;
  - It complies with the SEPA Regulation or any other relevant EU, Nordic or Swedish Regulation.

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<sup>1</sup> A scheme participant is a payment service provider which has formally adhered to an NPC payment scheme.

## 1.2 Overview of Change requests and proposed way forward for consideration by respondents to the Public Consultation

The table below lists all NPC Internal and External change requests which are submitted for public consultation. The table also includes the change requests that originates from EPC’s public consultation change request for SCT & SCT Inst 2027 versions. The NCT & NCT Inst WG has issued a recommendation on the way forward for each change request. The final decision whether a change request will be incorporated into the rulebook is however subject to the outcome of the public consultation.

**The contributors to this public consultation are requested to indicate whether they agree with the recommendation of the NCT & NCT Inst WG on the way forward.**

**In case the contributors do not agree with the NCT & NCT Inst WG recommendation, they are requested to indicate in the comments section of the response template NPC021-04 available on the NPC website, their preferred way forward (e.g., support of the original change request, selecting another option). Furthermore, any additional comments are welcome in the comments section.**

Detailed information regarding the EPC Change Requests for SCT and SCT Inst 2027 versions, will be available on EPC website, [following link](#), on March 13<sup>th</sup>, 2026.

Change Request NPC Item	Change Request EPC Item (if applicable)	Topic/Comment title	Contributor	Recommendation from NCT & NCT Inst WG The final decision is subject to the outcome of this public consultation
<b>NPC Internal 2025 version Change Request – For implementation in 2027 version of NCT Scheme</b>				
2025 CR#07	N/A	Introduction of Camt.055 NCT Scheme	NPC NCT & NCT Inst WG	Decided to be incorporated into the scheme as of November 2025 version – option b  NPC needed more time for this implementation, and the CR is now part of Nov 2027 version of NCT scheme – not open for comments in the public consultation.
<b>Scheme NPC Internal 2027 version Change Requests</b>				
#01	N/A	UETR New Attribute Number <b>NCT &amp; NCT Inst Scheme</b>	NPC NCT & NCT Inst WG	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b
#02	N/A	Planned Period of Non-Availability (Customer Channel Uptime) <b>NCT Inst Scheme</b>	NPC NCT & NCT Inst WG	Should be incorporated into the NCT Inst scheme as of <b>November 2027</b> - option b
#03	Unknown PSR	Freeze and Reserve Funds Recall due to Fraud Suspicious transactions (PSR article 65 and 69). NCT & NCT Inst Scheme	NPC NCT & NCT Inst WG	Withdrawn - awaiting PSR  <b>Not presented in this public consultation document</b>
#04	Unknown PSR	Provision of Commercial Trade Name Suspicious transactions (PSR article 16 and 25).	NPC NCT & NCT Inst WG	Withdrawn - awaiting PSR  <b>Not presented in this public consultation document</b>

Change Request NPC Item	Change Request EPC Item (if applicable)	Topic/Comment title	Contributor	Recommendation from NCT & NCT Inst WG The final decision is subject to the outcome of this public consultation
		NCT & NCT Inst Scheme		
#05	N/A (#25)	Partial Refund – Recall due to Fraud <b>NCT &amp; NCT Inst Scheme</b>	NPC NCT & NCT Inst WG	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b
#06	N/A	Changes to Structured Remittance Information, Underlying Elements <b>NCT &amp; NCT Inst Scheme</b>	NPC Task Force Implementation Guidelines (TF IG)	Should be incorporated into the NCT scheme as of <b>November 2027</b> - option b
#07	N/A	Chief Compliance Officer to Sign Legal Opinion <b>NCT &amp; NCT Inst Scheme</b>	NPC Secretariat	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b
<b>NPC External 2027 version Change Requests</b>				
#08 (#15)	#17	Funds Transfer Regulation Org Id <b>NCT &amp; NCT Inst Scheme</b>	Finance Denmark	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b (EPC CR #17)
#09	N/A	Customer to PSP Implementation Guidelines Mandatory <b>NCT &amp; NCT Inst Scheme</b>	Swedish National Debt Office (Riksgälden)	The change request <b>cannot be part of the existing scheme for 2027</b> – option e
#10	N/A	Message Type Id <b>NCT &amp; NCT Inst Scheme</b>	Finance Denmark	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b
<b>EPC 2027 version Change Requests</b>				
#11	#06	Migration to a Newer ISO 20022 Version for the 2029 Rulebooks <b>NCT &amp; NCT Inst Scheme</b>	EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG) and One-Leg Out Task Force (OLO TF)	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2029</b> - option b
#12	#07	Amendments to Rulebook Stipulations on Additional Optional Services (AOSs) <b>NCT &amp; NCT Inst Scheme</b>	EPC Legal Support Group	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b
#13	#08	Consistent Use of Term Payment Account <b>NCT &amp; NCT Inst Scheme</b>	EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG) and One-Leg Out Task Force (OLO TF)	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b
#14	#10	Beneficiary Initiated Repayment <b>NCT Inst Scheme</b>	EPC Payment Scheme Evolution and Maintenance Working Group (PSEMWG)	Should be incorporated into the NCT Inst scheme as of <b>November 2027</b> - option b

Change Request NPC Item	Change Request EPC Item (if applicable)	Topic/Comment title	Contributor	Recommendation from NCT & NCT Inst WG The final decision is subject to the outcome of this public consultation
#15 (#08)	#17	Changes to (Ultimate) Creditor-Debtor Organisation and Private Identification <b>NCT &amp; NCT Inst Scheme</b>	Scheme Evolution and Maintenance Standards Task Force (SEMSTF)	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b
#16	#18	Changes to Structured Remittance Information <b>NCT &amp; NCT Inst Scheme</b>	Scheme Evolution and Maintenance Standards Task Force (SEMSTF)	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b
#17	#19	Include Address for Originator -and Beneficiary Ref. Parties <b>NCT &amp; NCT Inst Scheme</b>	CH and LI PSP community	No recommendation defined by NPC for the public consultation
#18	#21	Validate Structured Remittance Information <b>NCT &amp; NCT Inst Scheme</b>	CH and LI PSP community	The change is already provided for in the NCT & NCT Inst scheme: no action is necessary for the NPC – option a
#19	#22	Align Effectiveness Dates with Those of Relevant Technical Standards <b>NCT &amp; NCT Inst Scheme</b>	SK PSP community	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b
#20 (#05)	#25	Procedure for Partial Recovery of Funds for Fraudulent Transfers <b>NCT &amp; NCT Inst Scheme</b>	Spanish Banking Community	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b (NPC CR#05)
#21	#27	Possibility to Return Funds after Credit of Amount <b>NCT &amp; NCT Inst Scheme</b>	Portuguese Banking Community (via CISP, an advisory body under Banco de Portugal)	No recommendation defined by NPC for <b>NCT scheme</b> for the public consultation  Cannot be part of the existing scheme for <b>NCT Inst scheme</b> - option e
#22	#35	Extend Recall Timeline for Duplicate and Technical Reason <b>NCT &amp; NCT Inst Scheme</b>	IT PSP community	Should be incorporated into the NCT & NCT Inst scheme as of <b>November 2027</b> - option b (with suggested conditional implementation time).
#23	#42	Reference to Link an SCT Inst Transaction for Refund with Initial SCT Inst Transaction <b>NCT Inst Scheme</b>	EPI COMPANY SE	Should be incorporated into the NCT Inst scheme as of <b>November 2027</b> - option b
#24	#45	SCT Inst-EPI-No Need for POI Indicator in SCT Inst Transactions <b>NCT Inst Scheme</b>	EPI COMPANY SE	The NCT & NCT Inst WG does not consider this item as a formal change request to the NCT Inst rulebook.

Changes for regulatory reasons

Change Request NPC Item	Change Request EPC Item (if applicable)	Topic/Comment title	Contributor	Recommendation from NCT & NCT Inst WG The final decision is subject to the outcome of this public consultation

## 2 Detailed analysis of Major Change Requests to the NCT and NCT Inst scheme rulebooks

This chapter details all the major comments with the NCT & NCT Inst WG analysis and recommendation.

### 2.1 2025 CR #07 Introduction of camt.055

#### 2.1.1 Description

This change request was submitted by NCT and the NCT Inst Working Group for the 2025 version of the NCT Scheme. The change request required additional time before implementation and has now been finalised and is ready for publication as part of the 2027 version of the NCT Scheme. This change request is therefore not open for input in the public consultation and is presented for information purposes only.

The suggestion is to introduce a new dataset in NCT Scheme through a camt.055 message and related camt.029 message data set. A camt.055 is a Customer Payment Cancellation Request message related to a previously sent pain.001 and the camt.029 is a response message (positive or negative to payment Cancellation). The purpose with the new dataset is to be used for when a customer initiates a cancellation of the payment message (payment file) in the Customer-to-PSP space.

The current NCT Scheme camt.056 (DS-05) is used as a FI To FI Payment Cancellation Request for when the banks initiate cancellation of the payment message in the interbank space. Camt.056 is also used for Recall by originator (DS-07). Both messages are used in the Inter-PSP space between two Scheme participating PSPs.

Camt.055 is commonly used by Nordic PSPs but there is currently no common standard for this message which means that PSPs make their own standards which can differ from each other. This does not benefit the customers nor ERP vendors that have raised a wish for a common standard.

The Norwegian community has already established a Message Implementation Guideline for the use of camt.055 and camt.029 (frequent use by corporate clients).

For details see NPC 2025 CR#07 in Annex I.

#### 2.1.2 NCT & NCT Inst WG analysis and recommendation

No new recommendation made by NCT & NCT Inst WG, it is ready for implementation in NCT scheme by November 2026.

#### 2.1.3 Rulebook Impact

This change request will impact both the Rulebook and the Customer to PSP Implementation Guidelines.

## 2.2 #01 UETR New Attribute Number

### 2.2.1 Description

This change request was made by NCT & NCT Inst WG for NCT & NCT Inst Schemes.

In 2025 version of NCT & NCT Inst Scheme Rulebooks the element UETR was introduced as part of CR #16 Optional use of Unique End-to-end Transaction Reference (UETR).

UETR stands for Unique End-to-End Transaction Reference. It is a globally unique identifier assigned to a payment transaction.

By introducing UETR as a yellow but optional element (done in 2025 version), it gives scheme participants an opportunity to use this as a complement to other transaction identifiers.

The suggestion is now to create an attribute for UETR and by that clarifying this reference and its usage. This attribute will also be in line with the attribute for UETR in the NOLO Scheme as well as the attribute for UETR in the OCT Inst Scheme.

An attribute is a **defined characteristic or data field** that forms part of a message or dataset in the payment scheme. Each attribute has a name (in this case AT-T016), a purpose may also have some rules for usage. In other words; attributes ensure **standardization and interoperability** between Payment Service Providers (PSPs) by clearly defining what data must be exchanged and how it should be structured.

For details see NPC CR#01 in Annex I.

### 2.2.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the scheme as of November 2027 - option b.

The NCT & NCT Inst WG recommends that this change is implemented to clarifying the usage and what information used for the element UETR in the NCT & NCT Inst Schemes.

### 2.2.3 Rulebook Impact

If this change request is supported, this will impact the Rulebook and Implementation Guidelines.

## 2.3 #02 Planned Period of Non-availability (Customer Channel Uptime) in NCT Inst

### 2.3.1 Description

This change request was made by NCT & NCT Inst WG for the NCT Inst Scheme.

The purpose with this CR is to highlight that it is possible for scheme participants to have a planned period of non-availability or planned downtime even if the NCT Inst Scheme is 24/7/365 instant scheme and the requirements for scheme participants are that services based on the scheme are available 24 hours a day and on all calendar days of the year.

This planned downtime needs to be short and foreseeable due to a planned maintenance or downtime whereby the customers have been informed in advance of those periods of non-availability.

In addition, this change will also clarify that the NCT Inst Scheme requires an uptime of 24/7/365 in the Inter-PSP space but cannot set out requirements for the uptime in the Customer-to-PSP space.

Regulation (EU) 2024/886, commonly referred to as the Instant Payments Regulation (IPR), entered into force in April 2024, brought significant changes to the SEPA Regulation. Article 11 (1) c) of the SEPA Regulation allows a planned maintenance or planned downtime of the instant credit transfer service by a PSP provided that the Payment Service Users have been informed in advance of those periods of planned maintenance or planned downtime. To this end, the 2025 SCT Inst scheme rulebook had been adapted accordingly. The SCT Inst scheme rulebook now mentions the possibility for PSPs of setting planned periods of non-availability of the instant credit transfer service being short and foreseeable due to planned maintenance or downtime whereby the customers have been informed in advance of those periods of non-availability.

EPC also plan to introduce the same text in OCT Inst 2027 version (se EPC OCT Inst CR #15 - set planned period of non-availability of the OCT Inst Service). NPC also plan to introduce the same rules in NOLO Inst 2027 version (to have the NOLO Inst scheme aligned with the NCT Inst scheme Rulebook).

The proposal is to foresee such planned maintenance or planned downtime as well for the NCT Inst scheme Rulebook. On this aspect, the 2027 NCT Inst scheme Rulebook would then be aligned with the SCT Inst scheme Rulebook.

For details see NPC CR#02 in Annex I.

### 2.3.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the scheme as of November 2027 - option b.

The NCT & NCT Inst WG recommends that this change is implemented since this is important for NCT Inst scheme participants to have the possibility for a planned, short and foreseeable downtime even without IPR requirements. By introducing this the NCT Inst scheme will also be aligned with SCT Inst scheme.

### 2.3.3 Rulebook Impact

If this change request is supported, this will impact the Rulebook.

## 2.4 #05 Partial Refund – Recall due to Fraud

### 2.4.1 Description

This change request was made by NCT & NCT Inst WG for the NCT & NCT Inst Schemes. EPC CR#25 for the 2027 SEPA payment scheme suggests a similar change.

The suggested change is to allow a partial return of the original funds in a NCT or NCT Inst Credit Transfer in case a recall is made with the Reason code FRAD (Fraudulent transaction) if not the full amount from the original pacs.008 transaction is available.

In current version of NCT & NCT Inst Rulebook it is stated that a transferred back amount due to a Recall can differ due to that Beneficiary PSP may decide to charge a fee to the Originator PSP. See section 4.3.2.2. With this change request it will be possible to transfer back an amount that differ from the original amount for the reason that there are not enough funds available at the Beneficiary's payment account, not only due to a fee taken.

A Recall occurs when the Originator PSP requests the Beneficiary PSP to cancel an NPC Credit or Instant Credit Transfer Transaction. The Recall procedure can be initiated only by the Originator PSP which may do it on behalf of the Originator.

The Recall can be made due to three specific reasons, among others for a fraudulent originated Instruction (FRAD).

In case the claimed fraudulent transaction has already been credited on the payment account of the Beneficiary and there are sufficient funds on the account of the Beneficiary for the Beneficiary PSP to potentially respond positively to this Recall request, in general the Beneficiary PSP will contact the Beneficiary to obtain its approval to send back the funds to the Originator.

In relation to Fraud claim cases, speed is the key to successfully recover any fraudulently credited funds from the payment account of the Beneficiary-fraudster.

To improve the success rate of recovering fraudulently obtained funds back from the Beneficiary before the Beneficiary potentially further transfers these funds to yet another payment account, the suggestion is to introduce the following business rule:

- When the Beneficiary PSP concludes that the Recall request for Fraud is justified, it sends a positive response to the Recall request within the Recall response timelines defined by the rulebooks.
- If the amount available in the Beneficiary's account is lower than the amount of the initial transaction to which the Recall request refers, and the Beneficiary PSP concludes that the Recall request for Fraud is justified, it shall send a positive response to the Recall with the response "partial return" and return the available amount in the Beneficiary's account.

The Nordic Bankers Associations made a legal analysis with the outcome that there are no hinders for this functionality in any of the three Nordic NPC countries Denmark, Norway and Sweden.

For details see NPC CR#05 in Annex I.

### 2.4.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the scheme as of November 2027 - option b.

The NCT & NCT Inst WG recommends that this change is implemented since it is important that NCT and NCT Inst scheme participants can prevent fraud and handle potential fraudulent transactions with the NPC payment schemes.

### 2.4.3 Rulebook Impact

If this change request is supported, this will impact the Rulebook and possibly also the Implementation Guidelines.

## 2.5 #06 Changes to Structured Remittance Information, Underlying Elements

### 2.5.1 Description

This change request was made by the NPC Task Force Implementation Guidelines (TF IG) for the NCT & NCT Inst Schemes.

In the current version of NCT & NCT Inst 2025 version, on XSD level, all underlying elements have been open according to ISO with no NPC restrictions, but they have not presented in NPC pdf IG.

The following changes will be made in NCT and NCT Inst pacs.008 to align with pain.001 in the schemes.

#### **Remittance Information/Structured/Referred Document Amount in NCT Scheme:**

- Due Payable Amount → will be presented as a yellow element
- Discount Applied Amount → will be presented as a white element
- Credit Note Amount → will be presented as a yellow element
- Tax Amount → will be presented as a white element
- Adjusted Amount & Reason → will be presented as a white element
- Remitted Amount → will be presented as a yellow element

#### **Remittance Information/Structured/Referred Document Amount in NCT Inst Scheme:**

- Due Payable Amount → will be presented as a yellow element
- Discount Applied Amount → will be presented as a white element
- Credit Note Amount → will be presented as a red element
- Tax Amount → will be presented as a white element
- Adjusted Amount & Reason → will be presented as a white element
- Remitted Amount → will be presented as a yellow element

For details see NPC CR#06 in Annex I.

### 2.5.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the scheme as of November 2027 - option b.

The NCT & NCT Inst WG recommends that this change is implemented to align pain.001 and pacs.008 messages in the NCT & NCT Inst schemes and to present all details in a correct way.

### 2.5.3 Rulebook Impact

If this change request is supported, this will impact the Implementation Guidelines.

## 2.6 #07 Chief Compliance Officer to Sign Legal Opinion

### 2.6.1 Description

This change request was made by the NPC Secretariat to the NCT & NCT Inst Schemes.

The NPC Secretariat requested its legal counsel to review the NPC's Adherence Guide for the NPC payment schemes following updates made by the Secretariat.

One of the updates relates to the legal opinion required from scheme applicants as part of the scheme adherence documentation. In the current NPC payment schemes, Section 7, Supporting Documents, states that:

**Supporting Documentation** – A legal opinion in the form set out on the website of the NPC, duly executed by the undertaking's internal or external legal counsel in accordance with the NPC Scheme Management Rules.

The proposed change is to explicitly include the role of the chief compliance officer in the wording, as set out below:

“A legal opinion in the form set out on the website of the NPC, duly executed by the undertaking's internal or external legal counsel, **or by the person responsible for the undertaking's compliance function (chief compliance officer)** in accordance with the NPC Scheme Management Rules.”

The NPC legal counsel considers that the role of a chief compliance officer can already be interpreted as falling under “executed by the undertaking's internal or external counsel.” However, it is recommended to explicitly include chief compliance officer for the sake of clarity.

This clarification is expected to be particularly beneficial for smaller PSPs that may not have internal or external legal counsel available.

The NPC Secretariat will also propose that the Scheme Management Committee approve a corresponding update to the NPC Scheme Management Rules (NPC900-01 NPC Scheme Management Rules).

For details see NPC CR#07 in Annex I.

### 2.6.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the scheme as of November 2027 - option b.

The NCT & NCT Inst WG recommends that this change is implemented since it is required by the NPC Secretariat's legal counsel.

### 2.6.3 Rulebook Impact

If this change request is supported, this will impact the Rulebook.

## 2.7 #08 Funds Transfer Regulation Org Id

### 2.7.1 Description

This change request was made by Finance Denmark on behalf of the Danish banking community for the NCT & NCT Inst Schemes. Please be aware that EPC is proposing CR #17 for SEPA schemes 2027 version with some changes to Organization Id and Private Id and the NCT & NCT Inst WG propose to follow that CR. Finance Denmark have agreed on that approach.

The suggestion in CR #08 from Finance Denmark was to, in the NPC Credit Transfer scheme and NPC Instant Credit Transfer scheme consider aligning the description of subtags relevant for the Funds Transfer Regulation (FTR) with similar description in the EPC scheme in the 2025 version of implementation guidelines.

In 2025 version of the SEPA schemes EPC added a Usage Rule stating that 'Either', 'AnyBIC', 'LEI' and/or one occurrence of 'Other' is allowed under Credit Transfer Transaction Information/Debtor/Identification/Organisation Identification.

Since EPC's 2025 SEPA schemes release EPC have changed their mind about this Usage Rule and are now proposing to remove it for the element Organisation Identification and instead only rely on the ISO standard. A new Usage Rule will be added in element (Ultimate) Debtor/ Identification/ Organisation Identification/ Other: "Up to three occurrences of 'Other' are allowed".

In addition to this they will also change the Usage Rule under: Credit Transfer Transaction/Information/Debtor/Identification/Private Identification.

Worth noticing is that this change will be made for both Ultimate debtor, Debtor, Ultimate Creditor and Creditor. Although the FTR does not impose the same requirements on the (Ultimate) Creditor as on the (Ultimate) Debtor, it is recommended to ensure, where possible, alignment between these data elements.

For details about NPC CR#08 see Annex I.

For details about EPC CR#17 Changes to (Ultimate) Creditor/Debtor Org Id & Private ID see EPC website (after March 13<sup>th</sup>).

### 2.7.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the scheme as of November 2027 - option b.

The NCT & NCT Inst WG recommends that NPC CR#08 is being implemented due to compliance with the Funds Transfer Regulation (FTR), in accordance with EPC CR#17. This is also the recommendation from the contributor of this CR, Finance Denmark.

### 2.7.3 Rulebook Impact

If this change request is supported, this will impact the implementation guidelines.

## 2.8 #09 C2PSP Customer to PSP Mandatory

### 2.8.1 Description

This change request was made by the Swedish Debt Office (Riksgälden) for the NCT & NCT Inst schemes. The suggestion is to make the NPC Customer to PSP (Payment Service Provider) Implementation Guidelines, for both the NCT & NCT Inst Scheme, mandatory instead of only recommended as they are today. Financial services are crucial for society to function, even in times of war. This means that payments must always work, even under the most severe conditions. To ensure resilience and continuity in the payment flow the sector needs to work together to develop joint capabilities within the financial systems.

The shift in the geopolitical landscape has deteriorated significantly. It is therefore imperative, not only for Swedish agencies to ensure the uninterrupted execution of government payments, but also for all Nordic market participants—both in the private and public sectors—to maintain operational continuity. Establishing sufficient redundancy within banking arrangements has become a matter of critical importance. This requires comprehensive contingency planning, diversification of payment infrastructures, and enhanced coordination among stakeholders to safeguard resilience and stability in financial operations. A key enabler of this resilience lies in the adoption of common standards.

The Swedish National Debt office is responsible for the central government payment model in Sweden and represents government agencies that currently face significant challenges in securing the necessary support from banks to transition to the ISO20022 standard in the customer-to-bank process. These agencies are mandated to ensure the uninterrupted execution of central government payments, which requires maintaining relationships with more than one bank. However, the absence of a harmonized customer-to-bank standard among banks severely limits the agencies' ability to manage these payments effectively. It is not sufficient for banks to harmonize processes and infrastructures solely at the interbank level; customers at the end of the payment chain must also be able to utilize the common standards. Only through such end-to-end alignment can the payment ecosystem achieve the robustness necessary to ensure that transactions function seamlessly under all conditions.

Making the Customer-to-Bank Implementation Guidelines for the NCT Rulebook mandatory would strengthen resilience and ultimately benefit all citizens in the Nordic region.

For details about NPC CR#09 see Annex I

### 2.8.2 NCT & NCT Inst WG analysis and recommendation

The change request cannot be part of the existing scheme for 2027 – option e.

The NCT and NCT Inst Working Group do not recommend proceeding with this change for the 2027 version of the NCT and NCT Instant Schemes.

The decision to make the NPC payment schemes Customer-to-PSP Implementation Guidelines only recommended was taken prior to the publication of the first versions of the NCT and NCT Instance Scheme Rulebooks. The rationale for this decision was that the Nordic countries do not have legal requirements equivalent to those applicable to EUR under the EPC framework (i.e. the SEPA Regulation). Furthermore, making the Implementation Guidelines binding (mandatory) could conflict with the principle of proportional access to payment systems and could create a risk of excluding potential participants that currently participate in national domestic clearing when migrating to the NPC schemes.

The Working Group does not consider these circumstances to have changed. Market progress remains slow, and the readiness required to make the Customer-to-PSP Implementation Guidelines mandatory is not yet in place. It was also concluded that any such change must be preceded by a market impact analysis to fully understand the implications for the market as a whole.

### 2.8.3 Rulebook Impact

If this change request is supported, this will impact the Rulebook as well as the Implementation guidelines.

## 2.9 #10 Message Type Id

### 2.9.1 Description

This change request was made by Finance Denmark on behalf of the Danish banking community for the NCT & NCT Inst Schemes.

The suggestion is to allow short name for Original Message Name Identification (change the usage rule) in the NCT and NCT Inst schemes.

The suggestion is to, in the NPC credit transfer and instant credit transfer scheme, aligning the description of the message type with similar description in the EPC scheme.

In the Implementation Guidelines 2025 version 1.0 for the field Original Message Name Identification, EPC allows a 'short' version of the referenced message type (e.g. 'pacs.008'), excluding version information, where NPC Implementation Guidelines 2025 version 1.0 still suggest the full message name version (e.g. 'pacs.008.001.08'), cf. screen shots with an example below:

Example from NPC payments Scheme:

Pacs.002, Original Group Information And Status/Original Message Name Identification:

NPC usage Rule **"Only pacs.008.001.08" is allowed**

Compared to EPC SEPA payment scheme:

Pacs.002, Original Group Information And Status/Original Message Name Identification:

SEPA usage Rule "Must begin with 'pacs.008'. **The addition of a variant number and version number is optional.**

For details about CR #10 see Annex I.

### 2.9.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the scheme as of November 2027 - option b.

The NCT & NCT Inst WG recommends that this CR is being implemented to align with the SEPA payment schemes.

### 2.9.3 Rulebook Impact

If this change request is supported, this will impact the Implementation guidelines.

## 2.10 #11 Migration to a newer ISO 20022 version for the 2029 rulebooks

### 2.10.1 Description

This change request was made by EPC PSEMWG for introduction in SCT and SCT Inst Rulebook 2027 (EPC 2027 #06). NCT & NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes.

This EPCs description of this change request:

Past developments:

The four SEPA payment scheme rulebooks migrated from the 2009 version to the 2019 version of the ISO 20022-based XML messaging standard in March 2024. For this ISO version change-over, the SEPA payment scheme participants and their service providers had a 18 months' lead time for this migration. This migration took place as a big-bang change-over. The OCT Inst scheme rulebook was launched in November 2023 and was based on the 2019 version of the ISO 20022 standard.

Several market infrastructures completed their migration to the 2019 version of the ISO 20022 standard (i.e. T2 from the Eurosystem and EURO1 from EBA Clearing) in the past years. SWIFT finished the migration from its FIN messages for payment instructions to MX messages to the same ISO version in November 2025.

Intentions of other market players using ISO 20022

The EPC observes that e.g., T2 payments will migrate more often to the latest possible ISO 20022 version. With the payment messages under the Cross-Border Payments and Reporting Plus (CBPR+) specifications now migrated to the 2019 version of the ISO 20022 standard in November 2025, SWIFT and possibly other market players may now actively submit change requests to ISO. If such changes are accepted, SWIFT and/or other payment infrastructures or systems might be inclined to migrate more often to a newer ISO 20022 version.

If the EPC payment schemes remain under the 2019 ISO version for too long, the EPC schemes will more and more diverge from the more recent ISO 20022 standard versions other market players may have adopted. The EPC payment schemes will not benefit either from the potential added value of those changes accepted under the later versions of the ISO 20022 standard.

**Another example is covered in the PSEMWG assessment for change request item # 34 with respect to camt.110 and camt.111 in section 2.26 of this document. These specific camt. messages do not exist under the 2019 ISO 20022 version.**

Expected EPC change requests to ISO

The EPC also analysed the new version of the Recommendation 16 of the Financial Action Task Force (FATF) whereby only the date of birth of the payer, when the payer is a natural person, must be provided in international payments as of end 2030. This will affect both SEPA transactions (for transactions between a EEA country and a non-EEA SEPA country), and OCT Inst transactions.

However, the 2019 version of ISO 20022 stipulates that the date of birth, the country of birth and the place of birth must be provided. Collecting and transmitting these 3 elements by PSPs in payment messages under the 2019 version may create operational and legislative (e.g., GDPR) challenges. In 2026, the EPC will address a change request to ISO to decouple the tie between three birth-related message elements.

If this EPC change request (and possible other EPC change requests) is accepted, the EPC payment scheme rulebooks will have to migrate to a future ISO 20022 version to benefit from it.

ISO version migration communication and planning

PSPs and CSMs require sufficient time to plan and implement an ISO version migration. For the 2019 ISO version migration, the EPC decided to give PSPs and CSMs 18 months lead time.

When adding such extended implementation time (e.g., 18 months) to the timeline needed for the regular EPC payment scheme rulebook change management cycle itself (i.e. +/- 11 months starting right

after the deadline to submit rulebook change requests up to the publication of the rulebooks and the implementation guidelines), the overall timeline is close to 30 months.

Concrete 2026 change request for all five EPC payment scheme rulebooks

Based on above-mentioned points, the proposal is to migrate all 2029 EPC payment scheme rulebooks to the latest available ISO 20022 version at that future point in time. Through this approach, the EPC can consult the European market early on for its possible support for an ISO version migration by November 2029. This migration will take place as a big-bang change-over.

Based on the outcome of the 2026 public consultation on this change request, in September 2026 the EPC will then decide whether all 2029 EPC payment scheme rulebooks eventually migrate to a newer ISO 20022 version in November 2029 or not.

If sufficient support is expressed, the EPC will then bring forward with 6 months the 2028 EPC payment scheme rulebook change management cycle and already communicate about it in 2026. PSPs and CSMs would have again 18 months lead time to implement. If such scenario would materialise, the 2029 rulebooks would then most likely be based on the 2027 ISO 20022 version (to be confirmed in due course).

In case an ISO version migration does not take place in November 2029, the next earliest possibility would be November 2031 provided the 2030 EPC payment scheme rulebook change management cycle is brought forward with 6 months to give PSPs and CSMs sufficient implementation lead time.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.10.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the NCT & NCT Inst scheme as of **November 2029** - option b.

The EPC PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2029**.

The NCT & NCT Inst WG support this change and give full support to EPC's proposal to migrate all 2029 NPC payment scheme rulebooks to the latest available ISO 20022 version. Through this approach, the NPC can consult the Nordic market early on for its possible support for an ISO version migration by November 2029. This migration will take place as a big-bang change-over.

NCT & NCT Inst WG also support the suggestion to, if sufficient support is expressed for this CR, bring forward with 6 months the 2029 NPC payment scheme rulebook change management cycle and already communicate about it in 2026. PSPs and CSMs would have again 18 months lead time to implement. If such scenario would materialise, the 2029 rulebooks would then most likely be based on the 2027 ISO 20022 version (to be confirmed in due course).

In case an ISO version migration does not take place in November 2029, the next earliest possibility would be November 2031 provided the 2031 NPC payment scheme rulebook change management cycle is brought forward with 6 months to give PSPs and CSMs sufficient implementation lead time.

### 2.10.3 Rulebook Impact

If this change request is supported, this will impact the Rulebook as well as the Implementation guidelines.

## 2.11 #12 Amendments to Rulebook Stipulations on Additional Optional Services (AOSs)

### 2.11.1 Description

This change request was made by the EPC Legal Support Group, LSG (EPC 2027 CR#07). NCT & NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes.

#### EPC description of the change request:

The Eurosystem as Overseer for the EPC payment scheme rulebooks has put additional Oversight recommendations on the EPC as payment scheme manager. The EPC agreed with a concrete action plan to meet these Oversight recommendations. The EPC will take a more proactive role in ensuring among others the ongoing compliance of the scheme participants and their service providers with the schemes' rules.

One area of attention is the Additional Optional Services (AOSs). Local, national and pan-European communities of EPC payment scheme participants may only offer AOSs in accordance with the three concrete principles outlined in each rulebook.

The suggestion is to add some extra paragraphs in the rulebook section 2.3. Local, national and pan-European communities of participants would then first have to present any AOS characteristics, business rules and technical specifications from that community of participants concerned, to the EPC for review by the relevant EPC bodies, as appropriate.

Once the EPC has validated such AOS, the community of participants concerned would then have to disclose the AOS on a publicly available website in both local language(s) and in English and provide the EPC with all relevant information so that the EPC can publish it on the EPC Website.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.11.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the NCT & NCT Inst scheme as of **November 2027** - option b.

The EPC PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2027**.

The NCT & NCT Inst WG recommends going forward with this change to align with the SEPA schemes in the area of AOS. Even though the NPC does not have the Eurosystem as Overseer as the EPC have, the intention of this change to clarify the process of introducing an AOS to the schemes, is equally relevant for the NPC and this change is in line with the process set up by the NPC for AOS.

### 2.11.3 Rulebook Impact

If this change request is supported, this will only impact the rulebook.

## 2.12 #13 Consistent Use of the Term Payment Account

### 2.12.1 Description

This change request was made by the EPC OLO TF and the PSEMWG (EPC 2027 CR#08). The NCT & NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes.

#### EPC description of the change request:

The EPC payment scheme rulebooks sometimes refer to the 'Account', 'account' and 'Payment Account'. This may create some confusion among PSPs and other stakeholders. The two EPC bodies point out that the reference can only be to payment accounts, i.e., used for the execution of payments, holding the Funds needed etc.

Therefore, the proposal is to apply a consistent use of the term Payment Account throughout all EPC payment scheme rulebooks, and this in alignment with the current applicable EU legislations.

In practice, the term 'account' in the SCT, SCT Inst, SDD Core, SDD B2B scheme rulebooks and to a certain extent the OCT Inst scheme rulebook, and any related rulebook annexes, will be replaced with the term 'Payment Account'.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.12.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the NCT & NCT Inst scheme as of **November 2027** - option b.

The EPC PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2027**.

The NCT & NCT Inst WG recommends going forward with this change to align with the SEPA schemes but also since this inconsistency was identified by NPC TF IG as well.

### 2.12.3 Rulebook Impact

If this change request is supported, this will only impact the rulebook.

## 2.13 #14 Beneficiary Initiated Repayment

### 2.13.1 Description

This change request was made by the EPC PSEMWG (EPC 2027 CR#10). NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes.

#### EPC description of the change request:

End April 2025, the EPC launched a one-month public consultation on the use of SCT Inst at the POI3. Following a public call for interest launched in mid-October 2025, the EPC held a EPC Instant Payments-at-POI Workshop on 14 November 2025 with payment solution providers who at that time operated account-to-account POI solutions in SEPA (or planned to launch such solutions within six months from then).

One conclusion from this workshop was that there is a need for a Merchant-Beneficiary initiated “repayment” feature under the SCT Inst scheme being similar to what is known under e.g., the payment card schemes. The Spanish PSP community already supports an Additional Optional Service (AOS) whereby the Merchant-Beneficiary can make a return of funds without the Originator having to initiate first an SCT Inst Recall or a Request for Recall by the Originator (RFRO) request. The proposal is to foresee a Repayment procedure under the SCT Inst scheme rulebook allowing the Beneficiary to transfer back funds of a previously successfully settled SCT Inst transaction. Such procedure can be used for all kinds of SCT Inst transaction use cases including SCT Inst transaction made at an POI.

Under the 2025 SCT Inst scheme rulebook, some of these situations can only be regularized when the payer itself initiates a SCT Inst Recall or a RFRO request. Additionally, the Recall and RFRO processes can be initiated up to 13 months (depending on the concrete indicated Recall/RFRO reason) after the SCT Inst transaction debit date. The resulting investigation and reconciliation between such request and the initial SCT Inst transaction can be a time-consuming process for the Merchants. With a formal Repayment procedure, the Merchant-Beneficiary can pro-actively transfer back the funds to the payer through the same instrument with which the initial payment had been made and give the payer a reassuring customer experience/ service.

**The change request puts forward two possible ISO 20022 messages for the Repayment procedure in the inter-PSP space i.e. via a pacs.008 message, or through a pacs.004 message.**

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.13.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the NCT Inst scheme as of **November 2027** - option b.

The EPC PSEMWG suggests incorporating the change request into the scheme (option b) entering into effect as of **November 2027**. Participants to the public consultation supportive to the proposed Repayment procedure, are requested to indicate whether they prefer the pacs.008 or the pacs.004 as underlying message to support this procedure in the inter-PSP space.

The NCT & NCT Inst WG recommends following the EPC PSEMWG waiting outcome in the public consultation.

### 2.13.3 Rulebook Impact

If this change request is supported, this will impact the rulebook and the Inter-PSP implementation guidelines.

## 2.14 #15 Changes to (Ultimate) Creditor-Debtor Organization and Private Identification

### 2.14.1 Description

This change request was made by the EPC Scheme Evolution and Maintenance Standards Task Force, SEMSTF (EPC 2027 CR#17). NCT & NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes. For this CR the NPC refer to for NPC CR #08.

EPC description of this change request:

The contributor proposes changes to the SEPA Usage Rules for the following message elements:

- (Ultimate) Debtor /Identification /Organisation Identification
- (Ultimate) Debtor/ Identification /Private Identification
- (Ultimate) Creditor/ Identification / Organisation Identification
- (Ultimate) Creditor/ Identification/ Private Identification

Concretely, the proposals for the (Ultimate) Debtor are to:

- Remove the SEPA Usage Rule “Either ‘AnyBIC’, ‘LEI’ and/or one occurrence of ‘Other’ is allowed” in the element ‘(Ultimate) Debtor/ Identification/ Organisation Identification’.
- Include a new SEPA Usage Rule “Up to three occurrences of ‘Other’ are allowed” in the element ‘(Ultimate) Debtor/ Identification/ Organisation Identification/ Other’.
- Update the SEPA Usage Rule (as marked in bold) “Either ‘Date and Place of Birth’ or **up to two ~~one~~** occurrences of ‘Other’ are allowed” in the element ‘(Ultimate) Debtor/ Identification/ Private Identification’.

As for the (Ultimate) Creditor, the proposals are to:

- Remove the SEPA Usage Rule “Either ‘AnyBIC’, ‘LEI’ or one occurrence of ‘Other’ is allowed” in the element ‘(Ultimate) Creditor/ Identification/ Organisation Identification’.
- Include a new SEPA Usage Rule “Up to three occurrences of ‘Other’ are allowed” in the element ‘(Ultimate) Creditor/ Identification/ Organisation Identification/ Other’.
- Update the SEPA Usage Rule (as marked in bold) “Either ‘Date and Place of Birth’ or **up to two ~~one~~** occurrences of ‘Other’ are allowed” in the element ‘(Ultimate) Creditor/ Identification/ Private Identification’.

These proposed changes ensure further alignment with the Regulation (EU) 2023/1113 on information accompanying transfers of funds and certain crypto-assets (i.e. Funds Transfer Regulation 3 – FTR3).

In case e.g., a natural person wants to provide two ‘identifiers’ (i.e. an official personal document number and a customer identification number as foreseen by the FTR), he/she will be able to provide these in two separate occurrences of ‘Other’ instead of having to combine it in one occurrence.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.14.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the NCT & NCT Inst scheme as of **November 2027** - option b.

The EPC PSEMWG recommend that this CR is incorporated into the SEPA payment schemes 2027 version.

The NCT & NCT Inst WG suggests incorporating the change request into the scheme as part of aligning with EPC SEPA Schemes but also because the change is in line with NPC CR#08 that proposes changes to be FTR compliant.

### 2.14.3 Rulebook Impact

If this change request is supported, this will impact the Customer-to-PSP and the Inter-PSP implementation guidelines.

## 2.15 #16 Changes to Structured Remittance Information

### 2.15.1 Description

This change request was made by the EPC Scheme Evolution and Maintenance Standards Task Force, SEMSTF (CR #18 for 2027). NCT & NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes.

EPC description of the change request:

The contributor proposes to remove:

- The reference in the description of the rulebook attribute AT-T009 “The Remittance Information” outlining for the **structured** remittance information “~~...of a maximum of 140 characters according to detailed rules to be defined.~~”
- The following SEPA Format Rule in the message element ‘Remittance Information/Structured’ “~~“Structured” can be used, provided the tags and the data within the ‘Structured’ element (i.e. excluding <Strd> and </Strd>) do not exceed 140 characters in length~~” in the related Implementation Guidelines (IGs).

This SEPA Format Rule was introduced in the past to facilitate the copy pasting of the whole ‘Structured’ data block (including tags) in the MT reporting messages. Given the migration to MX (ISO 20022), this argument will soon no longer be relevant. Additionally, using the maximum allowed characters defined by ISO 20022 for the structured remittance information (sub)elements - which are available for SEPA – would amount to a total of 164 characters.

This EPC CR does not include any changes to EPCs pacs.008 including Extended Remittance Information (ERI).

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.15.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the NCT & NCT Inst scheme as of **November 2027** - option b.

The EPC PSEMWG suggests incorporating the change request into the scheme (**option b**) entering into effect as of **November 2027**.

The NCT & NCT Inst WG recommend incorporating this CR for regular pacs.008 (non-ERI), which means removing the Usage Rule ‘a maximum of 280 characters according to detailed rules to be defined’.

The NCT & NCT Inst WG have differing views on whether the Usage Rule should also be removed for pacs.008 messages including ERI. The NPC uses a single pacs.008 message covering both regular pacs.008 and pacs.008 with ERI, which differs from the SCT scheme that uses two separate pacs.008 messages (one regular and one for ERI).

The NCT & NCT Inst WG is therefore unable to provide a recommendation on this point, pending any input received during the public consultation.

### 2.15.3 Rulebook Impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the Inter-PSP implementation guidelines.

## 2.16 #17 Include Address for Originator -and Beneficiary Ref. Parties

### 2.16.1 Description

This change request was made by the Swiss & Liechtenstein PSP community (EPC 2027 CR#19). NCT & NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes.

#### EPC description of this change request:

The contributor proposes to add two new optional attributes to cover the addresses of respectively the Originator Reference Party and of the Beneficiary Reference Party. The contributor points out that these attributes are already present in the OCT Inst rulebook.

In addition, the OCT Inst rulebook also includes the respective identification code (e.g., BIC or LEI) as optional attributes. The contributor suggests the EPC to consider adding those message elements as optional rulebook attributes as well.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.16.2 NCT & NCT Inst WG analysis and recommendation

No recommendation made for this CR by NCT & NCT Inst WG.

The EPC PSEMWG has no recommendation about this change request for the public consultation. On the one hand, these extra yellow optional message elements can be valuable for transparency and compliance reasons. On the other hand, there is a lack of a clear market need in combination with the investments to be made to implement this change request.

Instead, the PSEMWG is eager to know the views from the SCT Inst scheme participants and other SCT Inst stakeholders about this change request. Stakeholders submitting their comments about this change request are invited to express their opinion about this change request (in support of, not supportive to it, or no opinion) with an explanation about this opinion.

NCT & NCT Inst WG are of a different opinion since NPC already introduced Address for Originator -and Beneficiary Ref. Parties as yellow elements in 2023 version of the NCT & NCT Inst schemes.

The recommendation from the working group is a wait and see approach – if EPC receive positive input in the public consultation about this change NPC is likely to follow and add attributes for Address for Originator -and Beneficiary Ref. Parties. If EPC decide to not go through this CR, NPC will keep as is and not make any changes.

### 2.16.3 Rulebook Impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the Inter-PSP implementation guidelines.

## 2.17 #18 Validate Structured Remittance Information

### 2.17.1 Description

This change request was made by the Swiss & Liechtenstein PSP community (EPC 2027 CR#21).

#### EPC description of this change request:

The contributor proposes to adapt the definition of the attribute on the Remittance Information (AT-T009) as follows:

“(…)

*When the Originator provides an SCT Inst Instruction with a Structured Creditor Reference, ~~it is recommended that~~ the Originator PSP checks the correctness of the Structured Creditor Reference at the point of capture by the Originator.”*

The contributor points out that the correct usage of the Creditor Reference should be enforced at least at the initiation of the payment. Current statistics about the use of the message element showed that the use is not in line in the standard (e.g., the reference is not a valid ISO Creditor reference), which prevents a STP reconciliation by the Beneficiary.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.17.2 NCT & NCT Inst WG analysis and recommendation

The change is already provided for in the Scheme: no action is necessary for the NCT & NCT Inst scheme – option a.

The PSEMWG understands that this change request specifically targets only the ISO 11649 standard for structured Remittance Information, and not any other format of structured Remittance Information.

The PSEMWG suggests incorporating the change request into the scheme (option b) entering into effect as of November 2027 on the condition that only structured Remittance Information based on the ISO 11649 standard is to be validated.

In other words, the Originator PSP is only obliged to validate structured Remittance Information in the pain.001 message when that Remittance Information is based on the ISO 11649 standard. The other PSPs handling the subsequent pacs.008 message do not have to validate this message element.

NCT & NCT Inst WG view on this CR is that the NCT & NCT Inst schemes already have a stronger usage rule saying that the “Originator PSP is obliged to validate the correctness of the Structured Creditor Reference” and thereby there is no need to introduce this change to be aligned with the SEPA schemes. It could be reasonable to see the outcome of the new SEPA payment scheme usage rule if this CR is recommended and decide if the wording in that usage rule is suitable also for the NPC payment schemes.

### 2.17.3 Rulebook Impact

If this change request is supported, this will impact only the Rulebook and the Implementation guidelines.

## 2.18 #19 Align Effectiveness Dates with Those of Relevant Technical Standards

### 2.18.1 Description

This change request was made by the Slovak Banking Association (EPC 2027 CR #22). NCT & NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes.

#### EPC description of the change request:

The contributor suggests reviewing and aligning the planned effective dates of all EPC payment scheme rulebooks with the timelines applicable to other relevant technical standards related to the area of payments.

This adjustment would help maintain consistency and facilitate smoother coordination across different frameworks (e.g., SWIFT standards, November ECB releases) and avoid different timelines and go-live dates.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.18.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the NCT & NCT Inst scheme as of **November 2027** - option b.

The EPC PSEMWG suggests incorporating the change request into the scheme (option b) entering into effect as of **November 2027**.

The EPC will determine the effectiveness date of the 2027 rulebook version once the final Swift Standards MX Release 2027 date is known (currently it would be either 14 or 21 November 2027). This date should be known by the end of the summer of 2026.

NCT & NCT Inst WG recommends following the EPC having this change request implemented in the 2027 version of the NCT & NCT Inst schemes aligning with the SEPA payment schemes.

### 2.18.3 Rulebook Impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the Inter-PSP implementation guidelines.

## 2.19 #20 Procedure for Partial Recovery of Funds for Fraudulent Transfers

### 2.19.1 Description

This change request was made by the Spanish PSP community (EPC 2027 CR #25). NCT & NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes through NPC CR#05.

#### EPC description of this change request:

The contributor proposes a specific inter-PSP procedure to manage fraud-related Recall requests whereby there are not sufficient funds available on the account of the Beneficiary to honour the full amount of the Recall request. The contributor suggests foreseeing the possibility for a partial refund with the remaining funds on the account of the Beneficiary.

The contributor points out that such possibility would significantly enhance the recovery of fraudulently obtained funds and the operational efficiency in fraud case handling.

The contributor proposes the following modus operandi to deal with such specific cases:

- 1) The Beneficiary PSP responds negatively to the Recall request bearing the reason code “FRAD”, indicating as reason code “AM04 – insufficient funds” for this Recall refusal.
- 2) Subsequently, the Beneficiary PSP transfers back the remaining funds available on the Beneficiary’s account, to the Originator PSP. To do this, the Beneficiary PSP issues a new transaction indicating as category purpose code “OTHR”, and as purpose code “REFU” in order to identify the nature of this transfer.
- 3) In addition, the reference given by the Beneficiary PSP in this new transaction (now being the Originator PSP) must be the reference from the initial Recall request provided by the erstwhile Originator PSP.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.19.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the NCT & NCT Inst scheme as of **November 2027** - option b (through NPC CR#05)

The EPC PSEMWG cannot give a recommendation about this change request for the public consultation and will be neutral waiting for input from the public consultation. The upcoming Payment Services Regulation (PSR) may foresee a sound legal basis allowing the Beneficiary PSP to undertake such actions. However, the PSR had not been published yet at the start of this public consultation.

NCT & NCT Inst WG suggest this CR to be implemented in NCT & NCT Inst Schemes through NPC CR#05.

### 2.19.3 Rulebook Impact

If this change request is supported, this will impact the Rulebook and possibly the Implementation guidelines.

## 2.20 #21 Possibility to Return Funds after Credit of Amount

### 2.20.1 Description

This change request was made by the Portuguese PSP community (EPC 2027 CR#27). This CR is suggested by NCT & NCT Inst WG for NCT & NCT Inst Schemes.

#### EPC description of this change request:

The contributor proposes the possibility for the Beneficiary to return a SCT Inst transaction after the amount is credited, allowing the use of the Return R-transaction reason “return by order of the Beneficiary” for the SCT Inst scheme rulebook.

The contributor points out that this feature already exists in the SCT scheme and that the market is migrating to SCT Inst scheme, it should also be included in the SCT Inst scheme to support the business needs that currently exist on the SCT scheme.

The return of funds via a new flow/procedure/linked referenced message (see pacs.004) facilitates the reconciliation with the original transaction, which is not the case when a new transaction is initiated.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.20.2 NCT & NCT Inst WG analysis and recommendation

The NCT & NCT Inst WG cannot give a recommendation for this CR for the **NCT scheme** due to that the EPC PSEMWG has **no recommendation** about this change request for the SCT scheme in the public consultation. Instead, it is eager to know the views from the SCT scheme participants and other SCT stakeholders about this change request.

The code MS02 “Return by order of the Beneficiary” represents a low volume in the overall volume of SCT Returns (and the total number of SCT R-transactions itself being very low). There is no PSEMWG consensus whether extending the period for SCT Returns (via a pacs.004) is better compared to the Beneficiary simply making a new SCT transaction (being then a pacs.008 in the Inter-PSP space) to send back the funds.

Stakeholders submitting their comments about this change request are invited to express their opinion about this change request (in support of, not supportive to it, or no opinion) with an explanation about this opinion.

For the **NCT Inst Scheme** the NCT & NCT Inst WG follow the recommendation from the EPC PSEMWG for the SCT Inst Scheme recommending **not to be included** in the SCT Inst scheme Rulebook 2027 – option e.

This code is already supported as a Reject reason. The Beneficiary PSP can already do it. The Beneficiary can already upfront instruct the Beneficiary PSP to refuse a presented SCT Inst transaction when meeting certain conditions.

Reference is also made to the 2026 SCT Inst CR item #10 from the EPC itself. This CR proposes a SCT Inst Repayment procedure allowing the Beneficiary to transfer back funds of a previously successfully settled SCT Inst transaction.

### 2.20.3 Rulebook Impact

If this change request is supported, this will impact the rulebook, and possible the implementation guidelines.

## 2.21 #22 Extend Recall Timeline for Duplicate and Technical Reason

### 2.21.1 Description

This change request was made by the Italian PSP community (EPC 2027 CR#35). This CR is suggested by NCT & NCT Inst WG for NCT & NCT Inst Schemes.

#### EPC description of this change request:

The current timespan to initiate the Recall procedure is 10 Banking Business Days for the reasons 'Duplicate sending' (DUPL) and 'Technical problems resulting in erroneous SCT Inst' (TECH), and 13 months for the reason 'Fraudulent originated SCT Inst' (FRAD), following the execution date of the initial transaction subject to the Recall (see paragraph 4.3.2.2 in the SCT Inst scheme).

The contributor points out that in some circumstances, especially for bulk payments, it may take more than 10 Banking Business Days before the Originator PSP recognizes the need and thus is able to initiate a Recall process for the reasons 'Duplicate sending' and 'Technical problems resulting in erroneous SCT Inst'. As a consequence, the Originator PSP can no longer initiate a Recall and may wrongly use the Request for Recall by the Originator (RFRO) procedure (i.e. CUST reason code).

The contributor proposes to extend the timespan to initiate a Recall (DUPL and TECH reason codes) to 13 months, in order to improve the efficiency of the Recall process. This would also align the timelines of the Recall process foreseen for the three reason codes (FRAD/TECH/DUPL).

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.21.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the NCT & NCT Inst scheme as of **November 2027** - option b (see condition with suggested alternative implementation timeline below).

The PSEMWG recommends not taking forward the change request (option e) **based on the timeline extension (i.e. to 13 months) proposed in this change request.**

As an alternative for the public consultation, the PSEMWG proposes an extension to a **maximum of 15 banking business days** to initiate such types of Recall. The PSEMWG has no concerns with extending the timeline for Recalls due to duplicate or technical reasons. However, the proposed 13-months period is considered to be too long.

The NCT & NCT Inst WG support the recommendation from EPC PSEMWG of extending to a maximum of 15 banking business days for the NCT & NCT Inst Schemes.

### 2.21.3 Rulebook Impact

If this change request is supported, this will impact the rulebook.

## 2.22 #23 Reference to Link an SCT Inst Transaction for Refund with Initial SCT Inst Transaction

### 2.22.1 Description

This change request was made by EPI Company (EPC 2057 CR#42). This CR is suggested by NCT & NCT Inst WG for the NCT Inst Scheme.

#### EPC description of this change request:

The contributor proposes the introduction of a reference in Beneficiary/Merchant-initiated payments (used for refunds or chargebacks) to link the SCT Inst transaction of that refund or chargeback to the original SCT Inst transaction.

By introducing a reference ID in the SCT Inst message linked to a refund or a chargeback, this will help the PSPs in linking this SCT Inst transaction to the original SCT Inst transaction.

The contributor points out that such feature is to be introduced **only for POI transactions** and **not via a Recall message**.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.22.2 NCT & NCT Inst WG analysis and recommendation

Should be incorporated into the scheme as of **November 2027** - option b.

The PSEMWG suggests incorporating the change request into the SCT Inst scheme (option b) entering into effect as of **November 2027**.

This request is much aligned with the suggestion from the PSEMWG under EPC CR item #10 outlined in section 2.13 of this document. However, the PSEMWG stresses that item #10 does not limit itself to POI-initiated SCT Inst transactions only.

The NCT & NCT Inst WG support the recommendation from EPC PSEMWG and suggest implementing this change for the NCT Inst scheme to be aligned with the SEPA payment schemes.

### 2.22.3 Rulebook Impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the Inter-PSP implementation guidelines.

## 2.23 #24 No Need for POI Indicator in SCT Inst Transactions

### 2.23.1 Description

This change request was made by EPI Company (EPC 2057 CR#45). This CR is suggested by NCT & NCT Inst WG for the NCT Inst Scheme.

#### EPC description of this change request:

The contributor was informed that the EPC was considering the development of a 2026 SCT Inst change request to introduce an indicator to signal that the SCT Inst transaction was made at POI (e.g., mobile, unattended, online, POS).

The contributor is of the view that such change request by the EPC is not necessary at all.

The contributor believes that the implementation of such an indicator would be highly challenging because, with the widespread use of smartphones, the distinction between different channels is not anymore as clear as it was in the past.

Such change request from the EPC as originally presented should not be pursued because it could create serious complications. How is this information going to be used? Is it going to be shown to consumers as part of the SCT Inst transaction dataset that Originator PSPs show? Discrepancies in the data could lead to an increase in the number of customer complaints and in the contacts between consumers and merchants.

If the EPC were to pursue with such change request, the contributor recommends that a simple indicator of whether an SCT Inst transaction is related to a POI transaction (Yes/No) would be sufficient, instead of including multiple channel indicators.

For details about this CR see EPC website from March 13<sup>th</sup>, 2026.

### 2.23.2 NCT & NCT Inst WG analysis and recommendation

The NCT & NCT Inst WG does not consider this item as a formal change request to the NCT Inst rulebook.

The PSEMWG does not consider this item as a formal change request to the rulebook.

The SCT Inst scheme is channel agnostic. It should be avoided to create separate indicators for different channels.

Parties who wish to add data points in SCT Inst transactions to indicate e.g., the concrete POI channel, can already use the Purpose Code (AT-T007) and the Category Purpose Code (AT-T008).

The existing ISO category purpose codes and/or purpose codes could already be a suitable way forward. All codes of the ISO standard are accepted for both rulebook attributes.

Furthermore, four times per year, ISO can assess demands from the market for new purpose codes or category purpose codes.

The NCT & NCT Inst WG support the recommendation from EPC PSEMWG and will prepare to follow the outcome of this change for the NCT Inst scheme in the same way as EPC does for the SCT Inst scheme.

### 2.23.3 Rulebook Impact

If this change request is supported, this will impact the rulebook, the Customer-to-PSP and the Inter-PSP implementation guidelines.

### 3 Changes for Regulatory Reasons

As the NPC must ensure that the rulebooks comply with all applicable legislation, proposed changes to the rulebooks under this section are not subject to public consultation. They are included in this document for information but the contributors to this public consultation can comment on these changes. Such change is qualified as “*Change for Regulatory Reasons*” within the meaning of Section 4.2.9 of the Scheme Management Rules, due to legal amendments that “*necessitate the urgent alignment of the schemes with such rules and regulations*”.

For this release management cycle, no such changes have been deemed required.

### 4 Detailed Analysis of Minor Changes to the NCT and NCT Inst rulebook

For this release management cycle, no minor changes have been raised at this point in time.

## 5 Principles governing the Change Management Cycle

### 5.1 Change Request Public Consultation document

This Change Request Public Consultation Document is submitted by the NCT & NCT Inst WG in accordance with the procedures set out in the Scheme Management Rules in respect of changes to the NCT and NCT Inst rulebooks.

### 5.2 Structure of the Change Request Public Consultation document

Chapters 2, 3 and 4 describe the changes to the NCT and NCT Inst rulebooks which are proposed in this Change Request Public Consultation Document. These change requests fall into three categories:

- Chapter 2 covers innovative change requests to technical operations in chapters 3 and 4 of the rulebook and other significant non-technical changes which fall within the definition of a major change;
- Chapter 3 covers change requests to align the NCT and NCT Inst rulebooks with legislation;
- Chapter 4 proposes changes to correct typing errors and provide additional clarification to the NCT and NCT Inst rulebooks. These changes consist of minor changes which are uncontroversial in nature and do not affect technical operations.

**Annex 1 contains all received original change requests (NPC Internal and NPC external) for the 2027 NCT & NCT Inst rulebook change management cycle.**

**For all EPC suggested changes for the SEPA Schemes, that NPC recommend being implemented in NCT & NCT Inst Schemes, we refer to [EPC's website](#) where they will be published on March 13<sup>th</sup> as part of their Public consultation change request for 2027 version of the SEPA schemes.**

## 6 Change Management Cycle in respect of Major Change Requests

### 6.1 Considerations of Change Requests

In accordance with section 4.1.4 of the Scheme Management Rules, a number of change requests with respect to the rulebooks have been submitted for consideration to the NCT & NCT Inst WG. Following consideration of these change requests as required under section 4.1.6 of the Scheme Management Rules, the NCT & NCT Inst WG has determined:

- a) that the change requests set out in chapter 2 meet the criteria for acceptance into the 2025 NCT rulebook change management cycle; and
- b) that the change requests set out in chapter 4 constitute minor change requests invoking the procedures set out in section 4.3 of the Scheme Management Rules.

### 6.2 Change Request Public Consultation Document

The NCT & NCT Inst WG is responsible for the preparation and development of a Change Request Public Consultation Document in respect of the major change requests referred to in chapter 2 above and guiding the change requests through the rulebook change management cycle. The NCT & NCT Inst WG has therefore formulated this Change Request Public Consultation Document under section 4.2 of the Scheme Management Rules. This Change Request Public Consultation Document analyses the major changes which have been proposed and contains in Annex 1 the original change requests.

### 6.3 NCT & NCT Inst WG recommendations

The NCT & NCT Inst WG is required under section 4.2.1 of the Scheme Management Rules to issue a recommendation on the way forward regarding each change request. The reasons underlying each recommendation are detailed in chapter 2. The final decision whether a change request will be incorporated into the NCT and NCT Inst rulebooks is however subject to the outcome of the public consultation. The contributors to this public consultation are requested to indicate whether they agree with the recommendation of the NCT & NCT Inst WG on the way forward. In case the contributors do not agree with the NCT & NCT Inst WG recommendation, they are requested to indicate their preferred way forward.

### 6.4 Public Consultation on the Change Requests

The NPC encourages all Nordic stakeholders to provide feedback during the public consultation. Banking communities are asked to consult all their members who are involved in the NCT and NCT Inst scheme to ensure that the views of the payment services constituency are considered in the public consultation process. The NCT & NCT Inst WG encourages the Banking communities to consult as wide a range of stakeholders as possible, including NPC participants, future end users and service suppliers.

**All stakeholders should provide feedback to the NPC on the Change Request Public Consultation Document by June 3<sup>rd</sup>, 2026, at 17h00 CET at the latest.**

**The NPC will not consider any feedback received after this deadline.**

### 6.5 Next steps

Considering the comments received during the public consultation, the NCT & NCT Inst WG will produce a Change Proposal Submission Document to the NPC scheme Management Committee (SMC) for decision making purposes in accordance with section 4.2.5 of the Scheme Management Rules, and to the NPC Stakeholder Forum (see section 4.4 of the Scheme Management Rules) for their positions on the NCT & NCT Inst WG Change Proposals.

Approved change requests will be incorporated into the version 1.0 of the 2027 NCT and NCT Inst rulebooks and published in November 2026 with the intention that they become effective in November 2027.

## 6.6 Further information

The above is a summary of the change management process. If you would like further information, please refer to the Scheme Management Rules or contact the NPC Secretariat.

# 7 Change Management Cycle in respect of Minor Change Requests

## 7.1 Publication of list of Minor Change Requests

The NCT & NCT Inst WG is required under the Scheme Management Rules to publish a list of minor change requests on the NPC website and to ensure that the list may be viewed by all stakeholders. This obligation shall be met by the publication of this Change Request Public Consultation Document, and in particular through the provision of chapter 4 noting certain change requests as 'minor'.

The NCT & NCT Inst WG has not identified any minor change requests which they consider necessary for the NCT and NCT Inst 2027 rulebook to be presented in this document.

## 7.2 Comments on the Minor Change Requests

All stakeholders may submit comments on the list of minor change requests in this Change Request Public Consultation Document.

## 7.3 Submission of the list of Minor Change Requests to the SMC

The list of minor change requests shall be submitted to the SMC via the Change Proposal Submission Document in accordance with section 4.2.5 of the Scheme Management Rules.