European Payments Council

Response template: VOP Scheme Rulebook Urgent Change Request Public Consultation (document EPC326-25)				**Name respondent:**	

CR#	Contributor	Change request title	EPC VOP WG recommendation	Do you support the EPC VOP WG recommendation?	Comments regarding (non-)support of the EPC VOP WG recommendation
1	VOP WG	Effective date of the version 1.1 of the VOP scheme rulebook (and related documents)	The VOP WG recommended to publish a version 1.1 of the VOP scheme rulebook and related documents (i.e., VOP API specifications, EDS documentation…) by mid-March 2026 with an effective date by mid-June 2026	NO	While the EMA understands that some of the changes are urgent, a 3-months period is very little time for the revised Rulebook to comes into effect.

The EMA would suggest that a minimum 6-month period (to mid-September 2026) is afforded to allow VoP Scheme Participants adequate time to roll out the relevant technical changes. |
2	VOP WG	Use of BIC in the VOP messages	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	NO	While the EMA notes that all current PSPs in the scheme utilise an 11-character BIC, we recommend a formal impact assessment before implementation. If future participants hold only an 8-character BIC, they may be disproportionately affected by additional costs and delays associated with obtaining an 11-character code.
3	VOP WG	Remove the option INACNO from the EDS	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	
4	VOP WG	Empty API fields should not be allowed to be consistent with the standards	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	We would appreciate clarifications whether this change only impacts Optional (or also Mandatory) Attributes/Fields.
5	VOP WG	Update of the Major incident section and related documents	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	
6	VOP WG	Clarify that the wording of the communication messages between PSPs and PSUs are left to the discretion of the PSPs	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	
7	VOP WG	Clarify the character set to be used in the VOP APIs	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	
8	VOP WG	Clarify the use of the Timestamp and use of milliseconds	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	The EMA is partially supporting this change:

  a. The EMA does not agree with the proposed flexibility to be afforded to Requesting PSPs to calculate Maximum Execution Time (and therefore service timeout). Instead, the EMA suggests that the Maximum Execution Time is the Mandatory Time Stamp attribute included in the VoP Request Message (AT-T056) + 5 seconds as defined in section 3.3.2 of the Scheme Rulebook. The adoption of the approach detailed in this CR would allow Requesting PSPs to adopt different methods to calculating Maximum Execution Time leading to an inconsistent end user experience.

  b. The EMA supports the addition of an EPC Recommendation for Participating PSPs to use a time synchronisation protocol (like NTP) to ensure temporal alignments across the systems of Participating PSPs. |
| 9 | VOP WG | Clarify the use of all fields in the "Header" in the VOP APIs | b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly. | NO OPINION | |
| 10 | VOP WG | Clarify the use of the certificates | b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly. | NO | The EMA does not support the proposed clarifications on the use of Requesting/Responding PSP certificates that is detailed in this CR. Specifically:
  a. The continued use in the VoP API Security Framework (ASF) of re-purposed EU PSD2 qWACs issued in compliance with the Certificate Profile detailed in the ETSI TS 119-495 contradicts the intended use of such certificates. As stated in Section 5.3 (Note 3) of this ETSI standard "It is not intended that certificates issued under this profile are used just as client authentication certificates". Currently, the VoP ASF uses qWAC PSD2 certificates issued under this ETSI profile solely for client-side authentication of Requesting PSPs. It is also not a safe assumption that the qWAC EU PSD2 certificates that EEA-based Requesting PSPs source will include the relevant value (id-kp-clientAuth) in the Subscriber Certificate Extended Key Usage certificate extension. Thus, it is recommended that - going forward - the EPC chooses an alternative Certificate Profile and certificate validation rules that can be used to deliver the client-side authentication of requesting PSPs. The adoption of such an approach could also address the existing VoP Scheme accessibility issue for PSPs that are based in SEPA countries outside the EU/EEA. These PSPs are not able to take on the role of Requesting PSP since they do not have access to the EU PSD2 qWAC certificates detailed in the VoP ASF.
  b. The proposed Recommendation (in p.17 of the Consultation document EPC 310-25) for the Responding PSP to inform all Requesting PSPs/RVMs of the deployment of an EV TLS Certificate from a new Root CA using the contact list provided by the EPC does not read like a realistic or scalable arrangement. It is advisable that the EPC (through the EDS) takes on the task/responsibility of informing VoP Scheme Participants of the introduction of a new Root CA by Participant PSPs. |
11	VOP WG	Correction of section 4.8 point 18 in the VOP scheme rulebook	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	
12	VOP WG	Change VOP Task Force into VOP Working Group	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	
13	VOP WG	Correction of section 3.2.1 in the VOP scheme rulebook	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	