**Change Request**

**for the update of ISO 20022 financial repository items**

1. **Origin of the request:**

*A.1 Submitter*:

SWIFT

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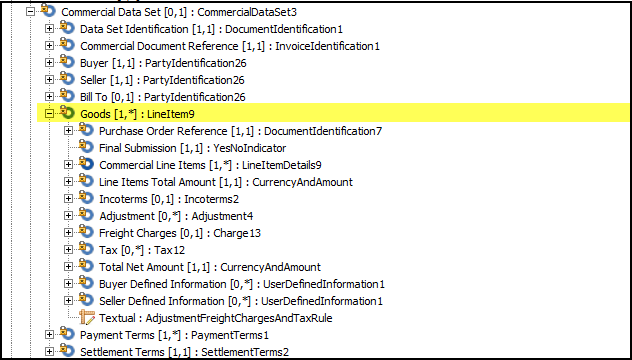
Email: rob.coombes@sc.com

1. **Related messages:**

*Goods* block in *CommercialDataSet* in

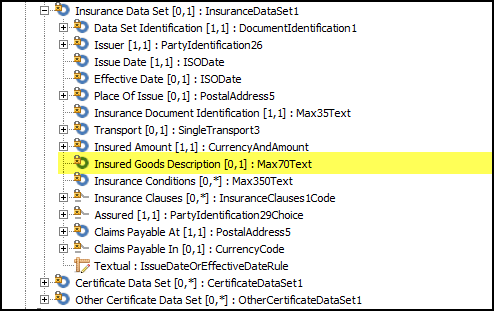
|  |  |  |
| --- | --- | --- |
| **#** | **Message ID** | **Message Name** |
| 1 | tsmt.014.001.04 | DataSetSubmissionV04 |
| 2 | tsmt.017.001.04 | ForwardDataSetSubmissionReportV04 |

1. **Description of the change request:**



Request change to the component *Goods* in *CommercialDataSet*

1. Add optional element ‘Goods and/or service description’ similar to existing element *InsuredGoodsDescription* in *InsuranceDataSet*.



1. **Purpose of the change:**

Trade has been identified as being high risk from the perspective of money laundering by regulators and industry associations around the world.

US alone, based on FINCEN’s advisory dated Feb 2010 that SAR reporting related to Trade based money laundering is increasing. Between Jan 2004 and May 2009, the reported transactions involved aggregated to over US$276billion

<http://www.fincen.gov/statutes_regs/guidance/pdf/fin-2010-a001.pdf>

In order to align with current and evolving regulatory demands in this area, the *tsmt* messages that support the BPO need to be enhanced to better ensure compliance with these demands.

1. **Urgency of the request:**

To be handled in accordance with the normal yearly maintenance cycle.

1. **Business examples:**

Documents such as Letters of Credit, Bills of Lading, and Invoices all provide for description of goods.

1. **SEG recommendation:**

|  |  |  |  |
| --- | --- | --- | --- |
| **Consider** | |  | **Timing** |
|  | | - **Next yearly cycle: 2014/2015**  (the change will be considered for implementation in the yearly maintenance cycle which starts in 2014 and completes with the publication of new message versions in the spring of 2015) | |  |
|  | | - **At the occasion of the next maintenance of the messages**  (the change will be considered for implementation, but does not justify maintenance of the messages in its own right – will be pending until more critical change requests are received for the messages) | |  |
|  | | - **Urgent unscheduled**  (the change justifies an urgent implementation outside of the normal yearly cycle) | |  |  |
|  | | - **Other timing:** | | |  |

Comments:

|  |  |
| --- | --- |
| **Reject** | X |

Reason for rejection:

The Commercial Data Set is designed to support line item level matching consistent with commercial documents such as the Invoice. The Insurance Data Set on the other hand does not support the notion of line items, instead utilises Insured Goods Description consistent with Insurance documents such as the Insurance Certificate. Proposed addition of a new element ‘Goods and/or service description’ to the Commercial Data Set is not considered appropriate, matching of the Commercial Data Set to the Baseline is required to be at the line item level.