**Change Request**

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

*Note: the purpose of this document is to give guidelines to parties who want to introduce a request to change an existing ISO 20022 message(s), or update other items of the ISO 20022 financial repository. Such change requests are subject to the approval of the ISO 20022 Standards Evaluation Group(s) in charge of the related message/item or to the approval of the Technical Support Group (TSG), if the requested change relates to the Business Application Header (BAH). Please consult the iso20022.org website for additional details on the* [*maintenance process*](http://www.iso20022.org/maintenance.page)*. Change requests are to be sent to* [*iso20022ra@iso20022.org*](mailto:iso20022ra@iso20022.org)*. All change requests conforming to this template received by June 1st will be considered for development in the following yearly ISO 20022 maintenance cycle which completes with publication of new message versions in April/May of the following year.*

1. **Origin of the request:**

*A.1 Submitter*: Euroclear Sweden

*A.2 Contact person:* Åsa Lewenhagen, [asa.lewenhagen@euroclear.com](mailto:asa.lewenhagen@euroclear.com), +46 73 684 91 29.

*A.3 Sponsors*: SE NMPG

1. **Related messages:**

seev.047.001.02 - ShareholdersIdentificationDisclosureResponseV02

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

We request a change to make the element ‘Shareholder type’ conditional (optional but with a validation rule stating when it must be included), instead of mandatory. To ensure that seev.047 messages sent in response to an SRD II request will include the element, we suggest adding a new element in the seev.047 containing information whether the request and response is per SRD II. If the element is set to TRUE, the existing element ‘Shareholder type’ should be required to include. If the new element is set to FALSE, the existing element ‘Shareholder type’ is optional to include.

1. **Purpose of the change:**

The Swedish market has a wish to use the SRD II messages for the local legal requirement for CSD participants that are nominees, i.e. that are allowed to hold securities in CSD accounts on behalf of clients, to provide information on their clients’ holdings upon request of the issuer or CSD. As the local legal context does not allow CSD participants to provide other information than what is specified in the legislation, the element ‘Shareholder type’ cannot be reported to the CSD. This means that these messages are not possible to be utilised for this purpose.

1. **Urgency of the request:**

SR2024

1. **Business examples:**

If the response is related to an SRD II request:

<DsclsrRspnId>SINCH06102020DSCL</DsclsrRspnId>

< ShrhldrRghtsDrctvInd>true</ShrhldrRghtsDrctvInd>  
…

<ShrhldgBal> <ShrhldgTp>BENE</ShrhldgTp>

…

If the response is not related to an SRD II request:

<DsclsrRspnId>SINCH06102020DSCL</DsclsrRspnId>

< ShrhldrRghtsDrctvInd>false</ShrhldrRghtsDrctvInd>

…

1. **SEG/TSG recommendation:**

*This section is not to be taken care of by the submitter of the change request. It will be completed in due time by the SEG(s) in charge of the related ISO 20022 messages or the TSG for changes related to the BAH.*

|  |  |  |  |
| --- | --- | --- | --- |
| **Consider** | | X | **Timing** |
|  | | - **Next yearly cycle: 2023/2024**  (the change will be considered for implementation in the yearly maintenance cycle which starts in 2023 and completes with the publication of new message versions in the spring of 2024) | | X |
|  | | - **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:

During the review of the CR by the SEG it was agreed that the change description should be reviewed by the submitter as following, and will be reflected in the MCR:

We request a change of the seev.047 message any of the following changes:

1. Make the ‘Shareholder type’ optional but no additional SRD II flag: 
   1. If the shareholder identification is SRDII related: the recipient of the seev.047 must check if the shareholder type is present. If not, the seev.047 should be rejected.
   2. If the shareholder identification is not SRDII related : no additional validation (shareholder type is optional).
2. Make the ‘Shareholder type’ optional and add additional SRD II flag together with validation rule (if SRDII flag in seev.047, shareholder type is mandatory):
   1. If the shareholder identification is SRDII related: the recipient of the seev.047 must check if the SRDII flag is present (which implies the shareholder type is there because of the network validation rule). If not, the seev.047 should be rejected.
   2. If the shareholder identification is not SRDII related : no additional validation (maybe reject if the client has put the SRDII flag as this would not make sense in this case?)
3. Add a fifth code in the ‘Shareholder Type’. Example NDLR (Not Disclosed due to Legal Reasons) with the usage: This type should only be used when the response is sent for a request where the issuer is not legally entitled to receive information regarding the type of shareholding (e.g., Swedish nominee reporting).

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

Reason for rejection: