EUROPEAN CENTRAL BANK

EUROSYSTEM

DG Market Infrastructure and Payments

ECB-PUBLIC
FINAL

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20 May 2026

T2S CHANGE REVIEW GROUP (CRG)

20 May 2026 from 09:30 to 15:00 CET

OUTCOME

1 Introductory remarks, approval of the agenda and action points

Background documentation:

<u>For discussion/ approval:</u>

A. [ECB] Draft CRG meeting agenda

<u>Outcome:</u>

The CRG Chairperson, Rémy Al Sbinati, welcomed participants and introduced the meeting, held remotely.

The CRG Chairperson introduced the meeting agenda, noting that it has been enhanced to include the objectives for each topic and to clarify expectations for the discussions. The CRG members approved the meeting agenda.

2 Outcome of previous meetings and review of the action points

Background documentation:

<u>For discussion/ approval:</u>

A. [ECB] Outcome of the CRG meeting on 15 April 2026

<u>For information:</u>

B. [ECB] List of CRG action points
C. [ECB] Recent resolutions on CRs since last meeting

<u>Outcome:</u>

The CRG approved the outcomes of the CRG meeting on 15 April 2026.

The CRG took note of recent resolutions on non-finalised change requests (CRs).

Finally, the CRG took note that the preliminary assessment (PAs) for CR-0872 is expected on 12 June 2026. No additional PAs are currently outstanding.

<u>Follow-up/Action Point:</u>

- *ECB team to publish the outcome of the CRG meetings on 15 April 2026 on the ECB website. [21 May 2026]*

3 Analysis of change requests

3.1 Change requests under implementation

Background documentation:

For discussion/ approval:

- ***T2S-0798-URD T2S COSD logic should support partial release of instructions subject to COSD and partial COSD release***

  [4CB] Updated CR-0798

Outcome:

The CRG took note of the status of the following Action Points (APs) related to CR-0798:

- ***AP-4247**[1]: The CRG took note that the expected use cases for sese.024 message were included both in the updated CR-0798 and in MyStandards. The CRG agreed to close the AP, noting that some use cases, notably, those with reason code CDLR, require some clarifications. The 4CB will review and address the open questions together with the ECB and CEU.*
- ***AP-4258**[2]: The CRG took note that the expected SDD updates have been incorporated in the updated CR-0798. The CRG agreed to close the AP accordingly.*

- ***T2S-0854-SYS CRDM reda messages should support the new securities account type 'End Investor Account' for Direct Holding Markets***
- ***T2S-0855-URD T2S should inform about Default Link Flag of Security CSD Links in reda.012 messages for Security CSD Links***

  A. *[4CB] Progress update on ISO CR related to CR-0854*
  B. *[4CB] Progress update on ISO CR related to CR-0855*

Outcome:

The CRG took note of the status of the ISO CRs required in view of CR-0854 and CR-0855, notably that they have been raised by the Eurosystem in February 2026 towards the ISO governance for Maintenance Release (MR) 2027.
The CRs are currently published on the SWIFT website and will follow the regular ISO change management process. The scope of ISO MR 2027 will be published in a dedicated report in September 2026.
The CRG agreed to close AP-4248[3] and AP-4250[4] accordingly.

- ***T2S-0859-SYS Upgrade of T2S messages to ISO MR 2026***

  C. *[4CB] Update regarding sese.020 and sese.029*

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[1] ***AP-4247:** 4CB to include the use cases for the sese.024 message in the updated CR-0798*
[2] ***AP-4258**: 4CB to confirm if the DA for CR-0798 needs to be updated during implementation phase*
[3] ***AP-4248:** 4CB to raise a new ISO CR to add the new code "ENDI" in the message schemas of reda.018, reda.019 and reda.021 in view of the ISO MR 2027*
[4] ***AP-4250:** 4CB to assess* potential *synergies between CR-0834 and ISO MR2027 (or other CRs) in R2027.NOV*

Outcome:

The CRG took note of the outcome of the written procedure regarding the upgrade of sese.020 and sese.029 in line with MR 2026.

One CRG member requested these messages to be upgraded instead as part of MR 2027, noting that including them in MR 2026 would create additional workload for updating documentation at this late stage.

The Eurosystem recalled the TARGET Services' strategy for ISO upgrades agreed by the MIB, according to which message versions should always be upgraded to the latest version available.

Given that implementation by the 4CBs (in T2S and ECMS) had already been initiated, and in order to avoid additional governance steps at this stage, such as seeking MIB approval for a deviation from the ISO strategy, the CRG agreed to proceed as concluded in the written procedure and to upgrade sese.020 and sese.029 to the latest message versions under MR 2026.

Notwithstanding this agreement, a CRG member questioned the added value of upgrading messages to the latest version even if the changes are related to fields that are pruned in the customised version used by T2S. The CRG requested clarifications on the MIB strategy to upgrade message versions to the latest MR in light of the increasing introduction of messages (e.g. related to crypto-assets and tokenised assets) that are not used in T2S.

The CRG agreed to open a new AP for the ECB to provide clarifications at one of the next CRG meetings [NEW AP]. The deadline is the CRG meeting in September 2026.

Follow-up/Action Point:

- *ECB team to open a new AP for a discussion to clarify the ISO strategy and potential exceptions to the guiding principle to update messages to the latest ISO MR version, in light of the introduction of new messages (e.g. related to crypto-assets and tokenised assets) that are currently not used in T2S. [1 September 2026]*

3.2 Change requests already authorised at T2S Steering Level (not yet under implementation)

Background documentation:

For discussion/ approval:

- ***T2S-0829-URD T2S Eligible Counterparty CSD Links should be at party level and no longer at security, Issuer CSD or country level, and***
- ***T2S-0846-URD T2S should not create a realignment chain in mixed scenarios where one realignment chain ends in T2S but the other one ends outside of T2S with an External CSD***
  - *A. [4CB] CR-0829 Detailed Assessment*
  - *B. [4CB] CR-0846 Detailed Assessment*
  - *C. [4CB] CR-0829 & CR-0846 DA Planning and Considerations*

Outcome:

The CRG took note of the detailed assessments (DAs) for CR-0829 and CR-0846 and that no operational risks have been identified. The 4CB confirmed that CR-0846 can be delivered with R2027.NOV and CR-0829 with R2028.JUN.

Regarding CR-0829, the CRG also took note that updates have been introduced in the CR change description in order to clarify that all counterparty CSD links should become ineligible at cutover date and duplicates should be removed. The OMG will be informed accordingly.
The CRG will review the CR DAs and decide whether to recommend their implementation to the PMG in a written procedure.

Follow-up/Action Point:

- *ECB team to initiate a written procedure to allow the CRG to review the DAs for CR-0829 and CR-0846 and decide whether to recommend their implementation to the PMG accordingly. [5 June 2026]*

- ***T2S-0845-SYS RTS enhancements: Reducing the IDB coupling between SETT and LCMM and improvement of the optimisation process***
    D. *[4CB] CR-0845 Detailed Assessment*
    E. *[4CB] CR-0845 Estimation of CPU Impact*

Outcome:

As requested at the previous meeting in line with AP-4274[5], the CRG was presented with the quantifiable benefits expected from the implementation of CR-0845.
The 4CB recalled that 66% of RTS capacity is currently dedicated to cash optimisation. With CR-0845, the CPU consumption is expected to decrease and enable 30-60% of savings on the Settlement (SETT) module.
The 4CB also clarified that the decoupling of SETT and LCMM is not expected to reduce overall CPU consumption, but rather to increase the resilience of the SETT software during the day.
The 4CB highlighted that the main benefits for users stemming from the changes introduced by CR-0845 include (1) a reduction of CPU consumption, (2) an increase in the speed for the securities optimisation process (notably due to the optimisation being performed at the level of a pool of transactions, rather than at transaction level), and consequently, (3) an increase in the settlement possibilities and (4) daily liquidity management (due to the cash netting effect).
Regarding testing specifications, the 4CB confirmed that it would conduct exhaustive functional, non-functional and non-regression testing of the cash optimisation process. In particular, the 4CB will perform non-functional testing of the Informational Data Base (IDB). The OMG will be informed to coordinate accordingly.
Some CRG members remarked that they may not be equipped to test CR-0845, apart from reviewing performance before and after implementation. Nevertheless, the 4CB will provide test cases to support user non-regression testing.
Finally, the CRG took note that no risks or security issues have been identified. The CRG agreed to close AP-4274 and recommended the inclusion of CR-0845 in the scope of R2028.JUN to the PMG.

- ***T2S-0865-URD Dedicated T2S gating event to optimise settlement resources in the context of the move to T+1***
    F. *[4CB] CR-0865 Detailed Assessment*
    G. *[4CB] CR-0865 DA Planning*

[5] **AP-4274**: 4CB to provide an indication of the quantifiable benefits of CR-0845

H. *[ECB] Summary of DA*

<u>Outcome:</u>

The CRG took note of the DA for CR-0865, confirming the feasibility for R2027.JUN, as originally requested by the PMG. The CRG also noted that the CR-0865 planning is in line with the overall testing strategy for T+1 coordinated by the T+1 governance (outside T2S). Following an OMG request, the UTEST deployment has been anticipated from 16 to 2 April 2027.

Regarding the ECMS impact identified, members noted that it will be addressed potentially with a new ECMS CR.

One CRG participant informed the group that the SMPG has raised a new ISO change request for MR 2027 to introduce a dedicated reason code to report eligibility for the gating event. Subject to the implementation of a new change request in T2S, this would allow the replacement of the current "OTHR" reason code, potentially with "GATE".

Regarding the Italian market, it was noted that, for liquidity management purposes, there is the need to identify whether a settlement instruction has failed prior to the settlement date. Consequently, the Italian community may raise a follow-up CR to address this requirement. For clarification, in certain cases, this information may be reported as part of the allegement notification, depending on when the instruction is created by the instructing party.

The CRG will be informed of the updated version of CR-0865, which will include additional clarifications.

Finally, the CRG took note that no risks or security issues have been identified. The CRG agreed to recommend the inclusion of CR-0865 in the scope of R2027.JUN to the PMG.

<u>Follow-up/Action Point:</u>

- *ECB team to share an updated version of CR-0865 following the CRG meeting on 20 May 2026, upon closure of the ongoing written procedure. [20 May 2026]*

3.3 Change requests not yet authorised at T2S Steering Level

3.3.1 Change requests under preliminary assessment

Background documentation:

<u>For information:</u>

- ***T2S-0860-SYS Re-map COSD related references into new element "Related Transaction Identification"***
- ***T2S-0861-SYS MITI and CMIT references should report Matching Transaction Identification in T2S sese messages***

A. *[4CB] CR-0860 Preliminary Assessment*
B. *[4CB] CR-0861 Preliminary Assessment*
C. *[ECB] Summary of feedback received during written procedure*

<u>Outcome:</u>

The CRG took note of the feedback received on the PA for CR-0861. The CR aimed to remove the matching reference from supplementary data and instead use the Counterparty MITI to report the matched leg.

Some CRG members objected to recommending CR-0861 for Steering Level authorisation due to negative impacts for their communities. Specifically, they remarked that the matching reference is critical for downstream reporting and reconciliation, as it is currently used to identify which settlement legs are matched by T2S, including in complex cross-CSD and realignment scenarios. The Counterparty MITI may not fulfil this purpose in certain scenarios.

It was recalled that a previous ISO CR, submitted by the Eurosystem to introduce a standardised field for reporting the matching reference, had been rejected by the ISO governance. This was based on the assessment that references reported under existing structured fields can already be used to report the matching reference. Therefore, it was acknowledged that re-submitting a similar ISO CR is likely to result in the same outcome.

The CRG agreed to inform the AMI-SeCo – Securities Group (SEG) that the TFOS objective to decommission supplementary data in line with best standardisation practices may not be achieved in this particular case. The CRG agreed to place CR-0861 on hold pending further feedback from the AMI-SeCo – SEG. A new action point will be opened to monitor progress on this topic. The deadline is the CRG meeting in September 2026.

Regarding CR-0860, whose scope supports the overall objective to decommission supplementary data in the future, the CRG agreed that it may still bring value in terms of reporting standardisation, even if supplementary data may not be decommissioned in the near future. The CRG agreed to recommend CR-0860 for Steering Level authorisation.

Follow-up/Action Point:

- *ECB team to open a new AP for the CRG secretary to report to the AMI-SeCo – SEG that the TFOS objective to decommission supplementary data in line with best standardisation practices may not be achieved due to identified negative impacts stemming from dropping the matching reference without an alternative structured field to report such information. [1 September 2026]*

- ***T2S-0866-URD T2S should attempt settlement of SIs/SRs on securities issued in East Asian/Pacific Markets prior to NTS C1S4***

  D. *[4CB] CR-0866 Preliminary Assessment*

Outcome:

The CRG took note of the PA for CR-0866. It was noted that the expected financial impact is high.

The CRG also took note of the 4CB preliminary findings and open issues regarding the CR's implementation.

With respect to these open issues, CSDs clarified that:

- *All settlement instructions and restrictions on APAC ISINs should fall under C1SQ with no exceptions.*
- *All settlement instructions and restrictions on APAC ISINs which do not settle until C1SQ should be included in C1SQ.*
- *In case corporate actions instructions related to APAC ISINs fail to settle in C1S1, these should also be recycled and attempted for settlement in C1SQ (even if this is a very unlikely case).*
- *In case transactions on APAC ISINs are under CoSD hold with the need to perform cash blocking, the related cash blocking settlement restriction will be attempted during C1S0; whereas if the APAC ISINs are under CoSD hold due to securities blocking, the related settlement restriction will be attempted during C1SQ (instead of C1S4 as is done today). This is relevant only from a functional perspective, as for non-Euro markets, CSDs will not apply CoSD cash blocking.*

- *In the highly likely scenario where there is a multi-issued APAC ISIN, and only one issuer CSD configured in the new Attribute Domain, then T2S should consider the underlying settlement transactions for the new sequence C1SQ.*
- *In-T2S issuer CSDs cannot be configured in the new Attribute Domain.*
- *Eligible PFOD settlement instructions should also be attempted in C1SQ.*
- *There is no business requirement to implement reverse collateral settlement instructions for APAC ISINs; even if, in principle, some APAC ISINs would be eligible for the auto-collateralisation substitution feature (in C1S3). The 4CBs should confirm during the detailed assessment which option would be easiest, or would better limit impacts, for implementation.*
- *The ECB will provide expected volumes of instructions eligible for C1SQ to the 4CBs bilaterally.*

Finally, the CRG agreed to enrich the current CR PA with the feedback provided during the meeting and to review the updated PA, including CR parameters, as well as provide business values via a written procedure. The CRG decision to recommend the CR for Steering Level's authorisation will also be sought in writing.

Follow-up/Action Point:

➢ *ECB team to initiate a written procedure for the CRG to review the PA of CR-0866, including the CR parameters, as well as provide business values and decide whether to recommend it for authorisation to the Steering Level. [5 June 2026]*

3.3.2 Candidates for preliminary assessment / Newly raised CRs

Background documentation:

For discussion/ approval:

- ***T2S-0864-SYS Adding a new dedicated NTS sequence for Corporate Actions processing***
  A. *[ECB] Proposed way forward for CR-0864*

Outcome:

The CRG took note of the ECB's proposal to withdraw CR-0864. The CR had been originally raised by the 4CB in January 2026 to introduce a new NTS sequence to address high volumes of Corporate Action (CA) events linked to end-investor models.

Following a review by the OMG, it was concluded that the identified issue does not require a T2S change and can instead be managed through an operational procedure. Consequently, the OMG placed the CR on hold, and invited the CRG to assess its potential withdrawal.

As no CRG members volunteered to take ownership of the CR, the group agreed to proceed with its withdrawal.

Follow-up/Action Point:

➢ *ECB team to update the status of CR-0864 on ECB website from "On Hold" to "Withdrawn". [21 May 2026]*

- ***T2S-0868-URD Extension of the T2S penalty mechanism exemption to cover transactions stemming from share registration***

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B. [CEU] Updated CR-0868

Outcome:

The CRG took note that CR-0868 had been updated and reviewed in writing. The revised version has been streamlined, limiting the conditions for exemptions to intra-account Free-of-payment (FOP) instructions and a specific sub-position.

The ECB team clarified that further streamlining could be possible, assuming that all FOP transfers within positions held in the same securities account (SAC) would be exempted from cash penalties, also considering settlement restrictions are already exempted. This point would need to be confirmed with ESMA. In the meantime, CRG members were invited to provide feedback on whether they foresee any cases where intra-account FOP could lead to a change of ownership between two different beneficiaries.

To clarify such cases, the CRG agreed to collect further feedback in writing.

The CRG also noted the need to introduce an additional clarification in the CR scope, namely that the delivering and receiving SACs must be the same. The CRG agreed to incorporate this additional requirement into the CR scope and to review the updated CR in writing.

A new action point will be opened for the ECB team to conclude on the CR scope, following ESMA's feedback regarding the potential exemptions for intra-account FOP transfers [NEW AP]. The deadline is the next CRG meeting in June 2026.

Follow-up/Action Point:

- *ECB team to open a new action point for a debriefing of the ECB exchange with ESMA on the treatment of intra-account FOP transfers for cash penalties at the CRG meeting in June 2026. [30 June 2026]*
- *ECB team to extend the ongoing written procedure for the CRG to review the updated scope of CR-0868, following inclusion of additional requirement(s), and to provide feedback on whether CRG members anticipate any business cases involving FOP transfers within positions held in the same SAC. [5 June 2026]*

- ***T2S-0870-SYS 'Connection of T2S UTEST environment to the SWIFT Cold Start site' &***
- ***T2S-0871-SYS 'Enhancement of Nexi CUG Domain Suspension Reversal Procedure'***

C. [ECB] Update on CR-0870 & CR-0871

Outcome:

The CRG took note that the OMG will discuss how to manage non-functional changes in their meeting on 22 May 2026. The CRG agreed to update the deadline of the related AP-4275[6] and AP-4276[7] from 20 May to 30 June 2026.

- ***T2S-0873-SYS 'Parking mechanism for instructions missing ISIN reference data set-up'***

D. [ESES] New CR-0873

Outcome:

The CRG took note of the new CR-0873, raised by Euroclear.

[6] **AP-4275**: ECB to debrief CRG on proposed approach for governance of non-functional changes
[7] **AP-4276**: OMG to follow-up on the need to have a CR for the *'Enhancement of Nexi CUG Domain Suspension Reversal Procedure'*

The objective of the change request (CR) is to introduce a parking mechanism to prevent the immediate rejection of settlement instructions and restrictions in cases where the related ISIN reference data has not been configured.
With CR-0873, if the CSD impacted by the settlement instructions has not setup the ISIN reference data, a notification is sent to the instructing party, providing enough time to configure the missing ISIN reference data. Once the ISIN reference data is completed, affected settlement instructions are recycled from the parking mechanism. In case the ISIN reference data is not completed within the specified time, e.g., until the end of the instruction's ISD, the instructions are finally rejected.
The CRG will be invited to review an updated version of CR-0873, including the 4CB's feedback, in a dedicated written procedure. The CRG will be invited to discuss the feedback collected during the written procedure at the next meeting.

Follow-up/Action Point:

- *ECB team to initiate a written procedure for the CRG to review the scope of CR-0873. [5 June 2026]*

3.4 Editorial CRs

Background documentation: None.

3.5 Change requests raised in other TARGET Services

Background documentation:

For information:

A. *[ECB] Status update on cross-service impacts*

Outcome:

The CRG took note of the status of CRs initiated in other services with potential impacts on T2S.

4 Clarification Notes

Background documentation: None.

5 Scope Defining Documents (SDD) Updates

Background documentation:

For discussion/ approval:

A. *[4CB] SDD publication planning for R2027.JUN and R2027.NOV*

Outcome:

The CRG agreed on the timeline for publication of T2S Scope Defining Documents in 2027.

6 Any other business

Background documentation:

<u>For information:</u>

A. [ECB] Delivery plan of change requests [table document]

B. [ECB] Upcoming releases and change requests [table document]

C. [ECB] Dashboard on cross-service impact of CRs [table document]

D. The following CRG meetings are planned in 2026 [to be confirmed at least 4 weeks in advance]:

<u>Outcome:</u>

The CRG took note that the next CRG meeting is scheduled for 30 June 2026 via Microsoft Teams.

The CRG also took note that the October meeting scheduled to take place at the ECB Main Building will be conducted in hybrid format (enabling online participation).

30 June 2026	09:30-15:00	Teams
01 September 2026	09:30-15:00	Teams
25 September 2026	09:00-11:00	Teams
15 October 2026	09:30-16:30	ECB Main Building
02 December 2026	09:30-15:00	Teams