

2022 年 10 月 21 日

CPMI 「Harmonisation of ISO 20022: partnering with industry for faster, cheaper, and more transparent cross-border payments」に対する意見

一般社団法人全国銀行協会

全国銀行協会として、CPMI から 2022 年 9 月 9 日に公表された「Harmonisation of ISO 20022: partnering with industry for faster, cheaper, and more transparent cross-border payments」に対して意見をすることが与えられたことに感謝の意を表したい。

本件が検討されるに当たり、我々のコメントが CPMI におけるさらなる作業の助けとなることを期待する。

以 上

「Harmonisation of ISO 20022: partnering with industry for faster, cheaper, and more transparent cross-border payments」への意見等

項番	頁	該当箇所	意見案
1	6	While adoption of ISO 20022 is proliferating, variability in its implementation and requirements with respect to cross-border payments potentially undermines its benefits. Indeed, many of the inefficiencies that the financial industry and its end users face with cross-border payments are caused by interoperability issues that arise because of misaligned message flows and incompatible data models along the end-to-end payment chain. An agreed set of core ISO 20022 messages supported by participants in cross-border payments, in combination with a well-defined data model, is seen to be a fundamental part of the overall programme to improve the efficiency, cost, speed, and transparency of cross-border payments.	ばらつきが ISO20022 導入の利益を損なう点は異論なし。 今後の ISO20022 のバージョンアップは多くの MI (market infrastructure) や市場参加者にとって初の経験となると思われるため、初回バージョンアップは十分なリードタイムを取り、実際の対応の経験を踏まえて無理のないタイムラインを見極めていくといった慎重な対応が必要と思料。
2	7	The joint task force believes that the CPMI ISO 20022 harmonisation requirements for cross-border payments should take effect after the MT/ISO 20022 co-existence period ends in 2025. Implementation during the co-existence period is not practical as many jurisdictions are in the process of migrating to the standard. Instead, the joint task force anticipates defining a data model that will allow those markets that have already adopted ISO 20022, or will adopt it in the next release, enough time to comply with the requirements beginning in 2025. In addition, sufficient time for those at earlier stages of implementation will be provided to align their plans with the desired data model for the future.	CPMI の要件を 2025 年に発効できるかは内容次第と思料。2025 年に向けて移行を行っている市場参加者も数多く存在していると思われ、移行期間は円滑な移行の実現に集中すべき。仮に、新たな要件がある場合は 2025 年以降を目標にすることも考慮すべき。
3	7	Existing ISO 20022 usage guidelines, like work conducted by CBPR+, provide a strong foundation for transitioning from legacy standards to ISO 20022. The existing usage guidelines are very detailed and updated frequently by the respective user communities (eg the community of correspondent banks in the case of CBPR+). Thus, they provide clear guidelines to users and an established process for responding to the needs of specific user communities as they arise. During the co-existence period, the existing guidelines will also be flexible in some respects to ease the transition from legacy formats to ISO 20022. For example, the existing guidelines will allow the continued use of unstructured data in some cases and will limit the length of certain fields in order to ensure interoperability with legacy formats.	フィールドの長さの制限は情報の欠落や様々な市場参加者のシステムに影響するため、ハーモナイゼーションの観点では慎重な対応を要すると認識。
4	8	Over 50 payment systems responded to a CPMI survey, which has helped inform what should and should not be included in the core message set. For example, messages regarding customer direct debits have very limited use in the cross-border space, and are often restricted to a regional or local implementation. Similarly, cheque-related messages were also excluded from the scope given their declining trend in use.	対応が必要な電文の種類が絞られることは有用だと思われるが、コアメッセージ/コアメッセージ以外への対応要否を当事者がどう判断すればよいかは明確にすべき。
5	8	The joint task force is currently considering the scope and content of the high-level requirements. The following are under discussion: • To achieve the overall objective of end-to-end payment process harmonisation, the joint task force is considering requiring use of structured data options and code information only. As highlighted by the survey, the greater use of rich and structured data is seen to be a significant factor in reducing frictions that can arise with the processing of cross-border payments. Not only will structured data help facilitate STP, it can also allow for automated and potentially real time compliance screening of payments in flight.	構造化情報やコードは事前定義が必要なため急な制裁や当局向け報告事項の追加等の規制への対応や稀なユースケースへの柔軟性を欠く点はデメリットと認識。コード以外の情報や非構造化情報を使用できる余地も残すべきと考える。
6	9	The joint task force is considering requiring use of a common single structured way to identify persons, entities, and financial institutions involved in cross-border payments. Defining minimum data requirements and at the same time restricting options to structured data (eg using ISO identifiers such as the Business Identification Code (BIC), in combination with recommending use of the Legal Entity Identifier (LEI)), can positively impact the processing and screening of cross-border payments along the end-to-end payment chain. This would enhance efficiency by reducing the likelihood of errors due to misinterpretation of data. Clear requirements on providing processing costs and charges can further improve overall transparency.	<ul style="list-style-type: none"> ✓ LEI 等の識別子は国ごとでその普及率に差異があることから、当該識別子の取扱い(必須/推奨)の検討においては、そのような状況も勘案されることが望ましい。 ✓ BIC は幅広く使われているが、すべての金融機関が保持しているわけではない点は考慮されるべき。 ✓ LEI の普及は各地域で足並みは揃っていない現状である。2025 年以降の枠組みとしての必須化を検討していくのであれば、LEI の必須化による STP 比率向上の効果と各事業法人の取得負荷や必要な情宣など費用対効果の検証プロセスを踏んだうえで、普及推進に向けた官民連携を視野に入れて取り組みが必要と思料。

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7	9	<p>The joint task force is considering requiring minimum capabilities to enable both the inclusion of structured remittance information with payments and to support mechanisms to reference remittance information when sent separately. The resulting improvement in reconciliation and treasury management processes can provide further benefits to end users.</p>	<ul style="list-style-type: none"> ✓ 各データエレメントの活用方法について、年末に予定されている市中協議で対象となるデータエレメントを明確にし、検討するための時間を十分に確保していただきたい。また、各国の民間部門との協議や、利用方法等に係るベストプラクティスを業界全体へ浸透・醸成させていく官民の働きかけが重要と考える。 ✓ Structured Remittance Information を活用するには、実際の使い方を決めた上で、送金側が正しく設定し受取側がその情報を読むことで初めて実現すると思料。minimum capabilities を定義するプロセスと、関係者の対応を可能にするタイムラインの考え方が重要。 ✓ “mechanisms to reference remittance information when sent separately.”は Related Remittance Information のことでよいか。既存の項目の使い方の明確化ならよいが、そうでないなら慎重な検討が必要と思料。また、関係情報を別途送る場合のスクリーニングの考え方は明確にすべき。

以上