

# SCoREBOARD

## Billing Processes – H1 2025

German NSG

### Background

Since publication of the [Collateral Management Harmonisation Report](#) in December 2017, the Advisory Group on Market Infrastructures for Securities and Collateral (AMI-SeCo) has made a number of significant breakthroughs in its ambition to create a [Single Collateral Management Rulebook for Europe \(SCoRE\)](#).

### What is SCoRE?

SCoRE defines common rules for managing collateral in Europe. These rules will replace the fragmented legacy standards, structural constraints and complex and diverse market practices that exist across Europe today. Implementation of SCoRE should remove operational impediments to the availability, usage and mobility of collateral. Market participants in AMI-SeCo have committed to implementing the SCoRE Rulebook, with the first set of rules due to be implemented by June 2025. Their implementation efforts are regularly monitored by AMI-SeCo which facilitates an active dialogue with market participants on issues related to the clearing and settlement of securities and to collateral management.

National stakeholder groups (NSGs) are coordination forums that have been established in the markets covered by the AMI-SeCo to support the implementation of the Single Collateral Management Rulebook for Europe (SCoRE).

The Single Collateral Management Rulebook for Europe contains four Standards related to billing processes (published as the [SCoRE Standards for Billing Processes](#)). Implementation progress is monitored twice per year.

### Introduction

This summary report presents the results of the H1 2025 monitoring exercise conducted by the German NSG with the involvement among the following stakeholders:

- 1 CSD – Clearstream Banking Frankfurt
- 16 Custodians

17 entities are monitored in the German market



In this monitoring exercise, participants were expected to have achieved all the milestones up to Milestone 12 inclusive “External testing completed for SCoRE” (with a deadline of 20 September 2024) as described in section 3 below.

Section 1 presents the key takeaways per Entity Type i.e., CSD, TPA, Custodian etc. Section 2 depicts the compliance status with the standards by each entity type. Section 3 focuses on the progress against the individual milestones and Section 4 provides concluding remarks.

## 1 Key takeaways

The majority of the reporting entities responded to the survey. This section presents the key findings of the survey for each entity type.

**Figure 1**  
**Summary of the monitoring exercise**

SCoRE SINGLE CUSTODIAL MANAGEMENT FRAMEWORK FOR EUROPE	 Response Rate	 Implementation Status	Are all milestones 1 to 12 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 16 June 2025)?
<b>Custodians</b>	75%	Implemented 29.41% Implementation started 2.94% Analysis started 26.47% Analysis not started 5.88% Replies not submitted 35.29% ----- Non applicable standards 29.17%	Average % of milestones achieved 43%	% of custodians on time 50%
<b>CSD - Clearstream Banking Frankfurt</b>	Survey submitted	Implemented 75% Implementation started 0% Analysis started 25% Analysis not started 0% ----- Non applicable standards 20%	<b>No</b>	<b>12/26</b>

Implementation of the Billing Processes Standards in the German market is on track

The implementation of the Billing Processes Standards in the German market is on track. Clearstream Banking Frankfurt as CSD has already implemented 3 out of 4 standards. The implementation of the remaining Standard 1 (ISO 20022 Standard messages) is still under analysis. In relation to custodians, most of the respondents have already implemented the relevant standards or implementation is on track.

The majority of implementing actors in the German market are on track to meet the milestones prescribed by the AMI-SeCo.

### **CSD – Clearstream Banking Frankfurt**

CBF as CSD already compliant with 3 out of 4 standards. Remaining standard 1 still under analysis.

The CSD, Clearstream Banking Frankfurt, is already compliant with 3 out of 4 standards. These three standards were already met before the SCoRE standards were formulated.

The remaining Standard 1 (ISO 20022 Standard messages) is currently still under analysis.

### **TPA – Clearstream Banking Frankfurt**

CBF as TPA will be no longer monitored.

Clearstream Banking Frankfurt informed that it will cease to be a Triparty Agent as of ECMS Go Live. From this date on Clearstream Banking Luxembourg will apply the harmonised triparty model and act as sole provider of TPA services within Clearstream group. For this reason, Clearstream Banking Frankfurt as TPA will no longer be monitored within this exercise.

### **Custodians**

Most of the custodians are on track with implementing the Billing Processes.

The vast majority of the German custodians responded to the survey.

Low compliance is reported for standard 1 (ISO 20022 messaging). Most of the custodians reported that the implementation of the Standard 1 is still under ongoing analysis or the analysis has not started. Some custodians responded that Standard 1 is not applicable for them or not applicable for custodians until Wave 2 (therefore the later status of implementation).

A majority of custodians have reported that they already comply with Standard 2 (Billing Cycles)

Billing Processes standard 3 and 4 are not relevant for custodians.

### **NCB**

Deutsche Bundesbank will adopt the Billing Standards in the context of the ECMS project.

As for NCBs, the implementation of the standards is underway in the context of the ECMS project. The Deutsche Bundesbank is on track to implement the SCoRE Standards for Billing Processes for its collateral management activities by June 2025.

## 2 Compliance level with the standards

This section provides an overview of the current status of compliance with the billing processes standards. CSDs and TPAs are monitored on an individual basis and are assigned a colour-code status in accordance with the methodology outlined in figure 2 below. Custodians are too many to represent individually. Thus the replies of custodians from the AMI-SeCo community participating in the monitoring are presented on an aggregated basis per market and assigned a percentage representing their compliance status.

**Figure 2**  
Standards implementation status as defined in the AMI-SeCo framework document



- The Standard has been implemented
- Implementation of the Standard is on schedule (based on the agreed milestones)
- Implementation is behind schedule (based on the agreed milestones)
- Implementation has not started

**Table 1**  
Compliance level with the standards by each entity type.

STANDARD	Custodians	CSD - Clearstream Banking Frankfurt
1: ISO 20022 messaging	14%	Y
2: Billing cycles	67%	B
3: Cut-off date		B
4: Dates for payments fees		B

Notes:

- Standards 3 and 4 are irrelevant for custodians
- For CSDs and TPAs the colour-code reflects the current implementation status of each Standard in accordance with the methodology outlined in figure 2 above.
- For custodians the % indicates the percentage of custodians which have implemented the standard or have the standard under development and implementation.
- Percentages are calculated on the basis of expected respondents, i.e. number of entities monitored in the market.

### 3 Progress towards the milestones

This section tracks market stakeholders progress in implementing the Standards against the 13 set milestones identified by AMI-SeCo.

The milestones facilitate consistent implementation across markets (given the long-term efforts that are needed) and avoids issues remaining undetected until the deadline to achieve compliance and implementation of the standards.

**Table 2**  
Milestones identified by AMI-SeCo

Milestone	Description	Date
<b>M1</b>	<b>Analysis Started:</b> Have you commenced an in-depth analysis of all applicable SCoRE Standards in order to identify and document all the changes required to internal processes and procedures in order to comply with the SCoRE Standards?	30/06/2020
<b>M2</b>	<b>Initial Communication:</b> Has initial high-level communication with external stakeholders on the changes introduced by SCoRE commenced?	01/03/2021
<b>M3</b>	<b>Analysis Completed:</b> Have you completed an in-depth analysis of all applicable SCoRE Standards?	31/07/2021
<b>M4</b>	<b>Documentation Completed:</b> Have you documented all the internal processes and procedures which need to be adapted in order to comply with the SCoRE Standards?	31/12/2021
<b>M5</b>	<b>Detailed External Communication:</b> Has detailed communication started regarding (i) upcoming changes in business processes, (ii) messaging formats and usage guidelines (in the case of new messages based on non-registered latest drafts by SWIFT) and (iii) planned testing activities been provided to users?	31/12/2021
<b>M6</b>	<b>SCoRE Adaptation Started:</b> Have you started to adapt/develop the processes and procedures in order to comply with the SCoRE Standards?	01/01/2022
<b>M7</b>	<b>SCoRE Adaptation Complete:</b> Have you completed the necessary adaptations/developments for the processes and procedures in order to comply with the SCoRE Standards?	30/06/2022
<b>M8</b>	<b>Internal Testing Started for SCoRE:</b> Have you started to test the changes to your internal processes and procedures which have been introduced in order to comply with the SCoRE Standards?	01/07/2022
<b>M9</b>	<b>Internal Testing Complete for SCoRE:</b> Have you completed the necessary internal testing?	10/03/2023
<b>M10</b>	<b>External Testing Started for SCoRE:</b> Are you in a position to test the changes introduced in order to comply with the SCoRE Standards with your user community (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	22/05/2023
<b>M11</b>	<b>Final External Communication on SCoRE:</b> has final communication to users been provided (i.e. updated user guide to reflect the changes implemented, final message usage guidelines for A2A communication) related to the SCoRE Standards?	22/05/2023
<b>M12</b>	<b>External Testing Completed for SCoRE:</b> Is the testing of the changes introduced in order to comply with the SCoRE Standards with your user community completed (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	20/09/2024
<b>M13</b>	<b>SCoRE Standards Implemented:</b> have the SCoRE Standards been implemented?	16/06/2025

The current H1 2025 monitoring exercise focuses on milestones 1 to 12 given that Milestone 12 “External Testing Completed for SCoRE” (with a deadline of 20 September 2024) was meant to have been achieved by the time the survey closed.

In each survey round, all the entities are asked to confirm (on a yes/no basis) whether the milestones will be met by the set milestones dates. If it is not the case, they are also asked the expected date for when the milestone will be reached.

For the milestones which had to be achieved by the time the survey closed: The blue colour code is assigned to those milestones that have been successfully achieved. Milestones that will only be achieved later than their set deadline are assigned a yellow status with indication of the likely date of achievement.

For the milestones that are only due to be achieved after the current reporting cycle: the green colour code indicates that the entity anticipates achieving that future milestone on time. A yellow status indicates that the milestone is foreseen to be met later than the set milestone date. In this case, the date of achievement anticipated is also indicated in the table.

**Table 3**

Expectation of achieving the milestones at the set dates

	Custodians	CSD - Clearstream Banking Frankfurt
Milestone 1 June 2020	69%	Yes
Milestone 2 March 2021	63%	Yes
Milestone 3 July 2021	38%	Yes
Milestone 4 December 2021	38%	Yes
Milestone 5 December 2021	38%	03/26
Milestone 6 January 2022	38%	03/26
Milestone 7 June 2022	38%	06/26
Milestone 8 July 2022	38%	07/26
Milestone 9 March 2023	38%	07/26
Milestone 10 May 2023	38%	08/26
Milestone 11 May 2023	38%	08/26
Milestone 12 September 2024	44%	08/26
Milestone 13 June 2025	50%	12/26

## Concluding remarks

Clearstream Banking as a CSD assigned a yellow status to milestone 5 and the following ones. The milestones have been postponed by Clearstream as a draft version 7 of the camt. 077 message has been received in June 2022. Clearstream expect to comply during 2026.

In addition, Clearstream Banking Frankfurt provided the following information:

AMI-SeCo version of DRAFT 7 of the camt.077 message was only received in June 2022. This date was a very long time outside of our planned window for analysis and it has been very hard to find time and resource to complete the analysis. Now that this analysis has progressed, we find we have significant issues with ambiguity of Standard 1, which after clarification is being interpreted differently from our current process, causing very considerable difficulty.

Milestone 13 is expected to be met in December 2026.

There is also a mixed picture regarding custodians. Milestones 1 to 2 have been met by 69 and 63%. Milestones 3-11 have been achieved on time by 38% of the custodians. Milestone 12 will be met on time by 44% and 50% are expected to comply with the last Milestone 13 on June 2025.

Low level of compliance is reported by custodians with Standard 1: ISO 20022 messaging (14%). The majority of the reporting custodians have already complied with Standard 2: Billing Cycles (64%).