

# SCoREBOARD

## Billing Processes – H2 2024

Portuguese 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 implement the SCoRE Rulebook, with the first set of rules due to be implemented by the ECMS go-live in November 2024. 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 H2 2024 monitoring exercise conducted by the Portuguese NSG with the involvement of the following stakeholders:

10 entities are monitored in the Portuguese market

- 1 CSD – Euronext Securities Porto
- 9 Custodians

In this monitoring exercise, participants were expected to have achieved all the milestones up to Milestone 11 inclusive “Final external communication on SCoRE” (with a deadline of 22 May 2023) as described in section 3 below. The findings of the monitoring exercise reflect the Milestones roadmap in place by the time the survey closed (i.e., 13 September 2024) and do not yet consider the AMI-SeCo reflections on the rescheduling of the existing SCoRE Standards implementation deadline from 18 November 2024 to 16 June 2025.

Section 1 presents the key takeaways per Entity Type i.e., CSD or Custodian. 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

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

Implementation of the Billing Processes Standards in the Portuguese market remains on track. The majority of the reporting entities responded to the survey and revealed a high level of compliance. This section presents the key findings of the survey for each entity type.

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

	 Response Rate	 Implementation Status	Are all milestones 1 to 11 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 18 November 2024) ?
<b>Custodians</b>	67%	Implemented 20% Implementation started 15% Analysis started 10% Analysis not started 10% Replies not submitted 45% ----- Non applicable standards 25.93%	Average % of milestones achieved 33%	% of custodians on time 33%
<b>CSD - Euronext Securities Porto</b>	Survey submitted	Implemented 80% Implementation started 20% Analysis started 0% Analysis not started 0% ----- Non applicable standards 0%	Yes	Yes

**CSD – Euronext Securities Porto**

Euronext Securities Porto is on track

It’s worth recalling that Euronext Securities Porto has decided together with other CSDs within the Euronext Group to develop a new billing system across the Euronext CSDs. The new billing system was implemented in Porto and Copenhagen in November 2023. In this vein, 80% of the standards have already been implemented.

Euronext Securities Porto reported a delay to some milestones but expects to meet the implementation date.

**Custodians**

Portuguese custodians have implemented on average 33% of milestones 1 to 11

The rate of participation by custodian in the Portuguese market during this monitoring round decreased from 78% to 67%. The average of milestones from 1 to 11 achieved by the Portuguese custodians who replied to que questionnaire, regarding the Billing Process Standards was 33%.

In addition to the low level of compliance with the prescribed milestones to date, only 33%) of the custodians have reported that they expect to reach the final implementation deadline.

Banco de Portugal is on track to adopt the SCoRE Standards

**NCB**

Banco de Portugal is on track to implement the SCoRE Standards for Billing Processes for its collateral management activities.

**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 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 - Euronext Securities Porto
1: ISO 20022 messaging	31%	G
2: Billing cycles	43%	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 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
M1	<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
M2	<b>Initial Communication:</b> Has initial high-level communication with external stakeholders on the changes introduced by SCoRE commenced?	01/03/2021
M3	<b>Analysis Completed:</b> Have you completed an in-depth analysis of all applicable SCoRE Standards?	31/07/2021
M4	<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
M5	<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
M6	<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
M7	<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
M8	<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
M9	<b>Internal Testing Complete for SCoRE:</b> Have you completed the necessary internal testing?	10/03/2023
M10	<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
M11	<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
M12	<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
M13	<b>SCoRE Standards Implemented:</b> have the SCoRE Standards been implemented?	18/11/2024

The current H2 2024 monitoring exercise focuses on milestones 1 to 11 given that Milestone 11 “Final external communication on SCoRE” (with a deadline of 22 May 2023) was meant to have been achieved by the time the survey closed. The findings of the monitoring exercise reflect the Milestones roadmap in place by the time the survey closed (i.e., 13 September 2024) and do not yet consider the AMI-SeCo reflections on the rescheduling of the existing SCoRE Standards implementation deadline from 18 November 2024 to 16 June 2025.

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 - Euronext Securities Porto
Milestone 1 June 2020	44%	Yes
Milestone 2 March 2021	44%	Yes
Milestone 3 July 2021	44%	Yes
Milestone 4 December 2021	33%	Yes
Milestone 5 December 2021	33%	Yes
Milestone 6 January 2022	22%	Yes
Milestone 7 June 2022	22%	Yes
Milestone 8 July 2022	22%	Yes
Milestone 9 March 2023	33%	Yes
Milestone 10 May 2023	33%	Yes
Milestone 11 May 2023	33%	Yes
Milestone 12 September 2024	33%	Yes
Milestone 13 November 2024	33%	Yes

## 4 Concluding remarks

Some heterogeneity among the Custodians regarding their expectations in achieving the Milestones. Nevertheless, it's worth recalling that, in the Portuguese market, the relevant changes related to Billing Standards will be of the responsibility of the local CSD (Euronext Securities Porto).

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For specific terminology please refer to the [ECB glossary](#) (available in English only).