Module A — Legal perimeter and implementation calendar

Editorial implementation aid; suggested owners and metrics are not statutory role titles or mandated KPIs.

Decisions

• Approve a provision-level delivery register with one accountable executive.

• Fund a 30-case both-bank evidence-service pilot with case-level acceptance tests.

• Separate EU obligations, EEA implementation and technical-standard dependencies.

Risks

• A single programme date hides entry-time and later matching duties.

• Council wording can still change before final adoption.

• A green internal dashboard hides missing recipient-bank evidence and the relevant refund route.

Dates and triggers

• Track Official Journal publication before calculating entry and application.

• Council Article 124: entry on publication plus 20 days; general application entry plus 21 months.

• Articles 51/58: entry plus 27 months; Articles 92/118: entry itself.

Accountable owners

• General counsel: legal scope and version register.

• Payments executive: product inventory and delivery funding.

• Fraud director: operational evidence requirements.

Measures

• Share of products with documented provision-level scope and owner.

• Number of unresolved deadline or dependency assumptions.

• Complete both-bank evidence share, handling minutes and cost per corrected case.

Council 8543/1/26 REV 1, 4 November 2026. Checked 2026-11-25. Article 87(3); Articles 55(1), 56(1)-(3), 57(1)-(2), 60(2)-(5); Articles 61(1),(6), 88(1)-(5), 124

Primary Council source