**Feedback Statement on Interoperable Fund Transfer Framework Policy Document**

## Introduction

Bank Negara Malaysia (BNM) has finalised and issued the policy document on the Interoperable Fund Transfer Framework (IFTF PD) with the objective of preserving interoperability of fund transfer services through greater network reach, whilst safeguarding the shared infrastructure's operational resilience, integrity and stability for public confidence.

In finalising the IFTF, BNM has given due consideration to the feedback received from financial institutions following the issuance of the exposure draft in 2025. This feedback statement sets out BNM's responses and clarifications to key areas raised by respondents, including matters addressed within the PD, as well as operational or commercial issues that fall outside the scope of the IFTF.

BNM wishes to record its appreciation to all respondents for providing valuable insights and feedback that have helped BNM in finalising the requirements in the IFTF PD.

**Bank Negara Malaysia**
**30 June 2026**

## 1. Interoperable fund transfer and QR payment services

*Prohibition of proprietary QR code schemes*

1.1 The vast majority of respondents offered no objections to the prohibition of proprietary QR code schemes recognising its importance to prevent market fragmentation and improve user experience. However, a few participants expressed concern that a full and immediate transition to a national interoperable QR code scheme may have significant cost implications to their institution while hampering their ability to offer tailored loyalty and marketing programmes to their customer base.

1.2 Under the IFTF, BNM remains steadfast in our vision to move towards an environment in which all QR payments in Malaysia are interoperable,[1] enabling a seamless user experience. Recognising that a few players will require system enhancements and adjustments to their operating models with this new requirement, a two-year transition period will be provided to affected institutions to enable the full migration to the interoperable QR code scheme.

1.3 In respect to concerns that the national interoperable QR code scheme limits innovation, BNM has consulted the operator of the shared payment infrastructure and has been assured that, participants retain full flexibility to design and implement loyalty and marketing programmes or other value-added services, within the shared payment network. Participants are encouraged to work closely with the operator to address any identified roadblocks which hamper such innovation and to also explore avenues for further collaboration. BNM is committed to supporting innovative solutions that enhance choice for end users in Malaysia.

*Applicability of DuitNow QR and proprietary QR provisions*

1.4 Some respondents, particularly financial institutions serving only large corporate clients, sought clarification on the applicability of the mandate to enable purchase transactions via the interoperable QR code[2] (P2M).

1.5 BNM wishes to clarify that the said requirement only applies to participants of the shared payment infrastructure that offer QR-based purchase services to the retail segment including financial consumers and merchants.[3]

*Provision of cross-border service via the shared payment infrastructure*

1.6 Some participants viewed that the provision of cross-border service under the shared payment infrastructure should remain optional.

1.7 In order to ensure seamless users' experience and to promote wider network effects, BNM intends to maintain the expectation that participants of the shared payment infrastructure must enable both domestic and cross-border services.

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[1] For the avoidance of doubt, this applies to both "on-us" transactions of participants and "off-us" transactions between the participants within the shared payment infrastructure but does not include payment transactions specified in paragraph 9.13 of the IFTF PD.

[2] Currently available P2M (payment to merchant) interoperable QR code solution is DuitNow QR POS.

[3] Refers to both issuing and acquiring side.

However, BNM will align the effective date of the mandate to the Nexus go-live timeline to streamline industry-wide cross-border efforts while support a smoother transition to Nexus implementation. Any exemptions from this mandate will only be considered where there is a clear and material risk arising from such enablement to the financial institution or to the broader ecosystem.

1.8 While the enablement of both domestic and cross-border services are currently only applicable to retail segments, BNM encourages financial institutions to extend these services to other client segments such as medium enterprises and large corporates, should there be demand.

1.9 Specific to non-bank participants, the provision of cross-border fund transfer services would generally also fall under the scope of the Money Services Business Act 2011 (MSBA). In this regard, BNM is currently working towards formalising, a list of businesses and services that will be excluded from MSBA in order to provide greater regulatory clarity. BNM will provide further updates to non-bank participants on this matter in due course.

## 2. Pricing and fee waivers

*Waiver of DuitNow Transfer transaction fee*

2.1 While respondents have expressed support to retain the current waiver threshold of the DuitNow Transfer transaction fee, most highlighted concerns on the current cost structure that effectively does not incentivise participants to pursue higher transactions and disregards the benefits of economies of scale.

2.2 BNM acknowledges this issue and is engaging closely with the operator of the shared payment infrastructure to explore appropriate mechanisms to support a fairer cost distribution across participants while ensuring the affordability of interoperable fund transfer services and preserving the resiliency of the shared payment infrastructure.

## 3. Shared payment infrastructure

*Access to the shared payment infrastructure*

3.1 Although access to the shared payment infrastructure is currently limited to domestic regulated entities, we recognise that other institutions may also bring value to the broader payment ecosystem. In this regard, BNM is open to engage with any interested institutions on the potential benefits and contributions they may offer to the shared payment infrastructure and Malaysian payment ecosystem.

*Routing of transactions through shared payment infrastructure*

3.2 Some respondents have sought clarity on BNM's position regarding the routing of "on-us" fund transfer transactions via the shared payment infrastructure. BNM therefore reiterates the need to route both on-us and off-us fund transfers via the QR code scheme through the shared payment infrastructure. This is intended to facilitate more effective system-wide monitoring of such transactions while supporting timely and coordinated fraud detection and response measures.