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Peppol MLR Deprecation and Phase-out Plan

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11 Introduction

This document describes the deprecation and phase-out of the Peppol Message Level Response (MLR) specification [MLR] in the context of the introduction of the Peppol Message Level Status (MLS) specification [MLS].

This document must be read in conjunction with:

- **Peppol MLS Phase-in Plan** [MLS Phase-in] – defines the mandatory timeline for implementing MLS receiving capability (**T1** to **T2**) and activating MLS sending (**T2** to **T3**). The MLR phase-out builds directly on those milestones.
- **Service Provider Operational Guideline on MLS** [SPOG MLS] – provides detailed implementation guidance for MLS, including the coexistence rules that govern the transition period when MLR and MLS are both present in the network.

The foundational rule that drives this phase-out timeline comes from [SPOG MLS] section 3.2:

One business document MUST only be responded with either MLR or MLS. If a receiver can handle both MLR and MLS, the usage of MLS MUST have priority.

This rule has a direct and immediate consequence for the phase-out timeline: as soon as an SP activates MLS sending (permitted from **T2**, mandatory from **T3**), that SP MUST stop sending MLR. The MLR phase-out therefore starts at **T2** – in parallel with the MLS sending activation window – and closes at **T4**, which is a maximum of one month after **T3**.

The target audience is primarily Peppol Service Providers. Peppol Authorities and software vendors may also use this document to plan the removal of MLR support from their systems.

1.1 References

The following standards and specifications are referenced in this document:

- [MLR] Peppol MLE Specification; <https://docs.peppol.eu/poacc/upgrade-3/profiles/36-mlr/>
- [MLS] Peppol MLS Specification; <https://docs.peppol.eu/edelivery/>
- [MLS Phase-in] Peppol MLS Phase-In; <https://docs.peppol.eu/edelivery/>
- [SPOG MLS] Service Provider Operational Guideline on MLS; <https://docs.peppol.eu/edelivery/>

12 Comparison: MLR and MLS

This section provides a structured comparison of the MLR and MLS specifications to demonstrate that MLS provides full functional coverage of MLR and extends it in areas that MLR does not address.

2.1 What MLR covers

The MLR specification [MLR] supports three situations:

- **Rejection** – the received message contained errors according to the relevant conformance rules and will not be processed further. Response code: **RE**.
- **Acceptance** – the received message passed validation without fatal errors. Response code: **AP**.
- **Acknowledgement** – the received message is acknowledged as received and identified as a business message, without performing conformance validation. Response code: **AB**.

Errors within scope for a rejection MLR include XML schema validation errors, standard compliance violations, Schematron fatal errors, Schematron warnings (may accompany a rejection but cannot alone cause one), and wrong document version.

MLR explicitly excludes from its scope: unknown sender/receiver, wrong envelope version, non-supported encoding, and wrong reference field values. These are handled by transport acknowledgements or business-level responses respectively.

2.2 What MLS covers that MLR does not

MLS covers all three MLR situations using the same Response Codes (**RE**, **AP**, **AB**), and extends them in the following ways:

- **Delivery failure towards C4** – MLR is limited to reporting on the conformance validation result of the received document. MLS additionally covers the case where C3 is permanently unable to forward the document to C4, regardless of whether the document is technically valid. This is reported with Response Code **RE** and Status Reason Code **FD** (Failed Delivery). This situation is entirely outside the scope of MLR.
- **Exhaustive rejection reason list** – MLR provides an open-ended list of rejection reasons. MLS defines an exhaustive, closed list of Status Reason Codes (**SV**, **BV**, **BW**, **FD**) covering every permitted rejection reason. C3 MUST NOT reject a document for reasons outside this list, which improves predictability for C2.
- **Structured line-level detail** – Both MLR and MLS support line-level error reporting. MLS formalises this with mandatory fields for each issue: an issue location, an issue description, and a Status Reason Code (rules OP-MLS-27 through OP-MLS-30). MLR's line-level structure is less prescriptive.
- **C2 as target receiver** – MLS allows C2 to be targeted as the document receiver. MLR has no equivalent mechanism.
- **Receiver-directed routing** (**MLS_TO**) – MLS allows C2 to specify an alternative participant identifier in the SBDH (**MLS_TO**) to direct MLS responses to a specific Access Point instance. MLR has no equivalent mechanism.

- **Sender-controlled response type** (`MLS_TYPE`) – MLS allows C2 to control via the SBDH (`MLS_TYPE`) whether C3 sends only negative responses (`FAILURE_ONLY`) or all responses (`ALWAYS_SEND`). MLR has no equivalent; the decision to send an MLR rests entirely with C3.
- **Mandatory behaviour with SLRs** – MLR sending is optional and subject to no timing requirements. MLS sending is mandatory for all SPs from T3 (per PNP Rules MLS-1 through MLS-4), and subject to Service Level Requirements: SLR MLS-1 ($M2 - M1 \leq 20$ minutes) and SLR MLS-2 ($M3 - M1 \leq 25$ minutes) for 99.5% of qualifying messages per month.
- **Issue time with time zone** – MLS requires both an issue date (without time zone) and an issue time including time zone information (rules OP-MLS-17 and OP-MLS-18). MLR requires only a date.

2.3 Structural differences

MLR and MLS differ in a fundamental architectural respect that is important for understanding the phase-out:

- **Party identification model** – MLR uses `cac:SenderParty/cbc:EndpointID` and `cac:ReceiverParty/cbc:EndpointID` with any Electronic Address Scheme (EAS) identifier. MLS uses the OpenPeppol Service Provider Identification Scheme (SPIS) exclusively, enforcing scheme `0242` via Schematron rules SCH-MLS-11 and SCH-MLS-16. MLS is strictly a Service Provider-to-Service Provider (C2/C3) communication. In the standard Peppol 4-corner model, MLR is only exchanged between C1 and C4, so this architectural difference also creates a functional gap in practice.
- **SMP registration model** – MLR does not require a dedicated SMP registration for receiving capabilities. MLS requires explicit SMP registration of receiving capabilities under the SPIS Main ID participant identifier (`0242:<6-digit-number>`) with the MLS Document Type Identifier and Process Identifier. This registration is the *Phase 1* obligation from [MLS Phase-in] and is what makes the MLS-priority rule technically enforceable: C3 can determine whether C2 has MLS receiving capability by inspecting the SMP before deciding whether to send MLS or fall back to MLR.
- **No response to status messages** – Both MLR and MLS share the rule that a status message **MUST NOT** be sent in response to another status message. An MLR **MUST NOT** be sent in response to an MLS, and vice versa.

2.4 Feature coverage matrix

Feature	MLR	MLS
Rejection response (RE)	Yes	Yes
Acceptance with confirmation (AP)	Yes	Yes
Acknowledgement without validation (AB)	Yes	Yes
Delivery failure to C4 (FD)	No	Yes
Exhaustive rejection reason codes	No (open list)	Yes (closed list)
Mandatory structured line-level detail	No (optional)	Yes (mandatory for RE)
Sender-directed MLS receiver (MLS_TO)	No	Yes
Sender-controlled response type (MLS_TYPE)	No	Yes
Issue time with time zone	No (date only)	Yes
Mandatory sending	No (optional)	Yes (from T3)
Service Level Requirements	No	Yes (SLR MLS-1, SLR MLS-2)
Addressee	End Users (C1, C4)	Service Providers (C2, C3)
Dedicated SMP registration required	No	Yes
No response to another status message	Yes	Yes

MLS provides complete functional coverage of MLR. Every situation that MLR handles is handled by MLS using the same Response Codes. No functional capability is lost in the transition from MLR to MLS.

1103 Migration Plan

111 This section contains the overall phase-out plan for MLR. It is based on the timeline of the
112 MLS phase-in plan [MLS Phase-in].

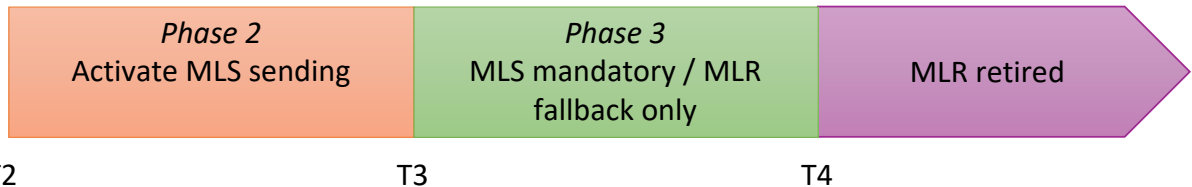


Figure 1: Overall MLR Phase-out plan in relation to MLS Phase-in milestones

115 This phase-out contains the following milestones:

- 116 • **T2:** MLS sending activation window opens. MLR phase-out starts. Any SP
117 activating MLS sending **MUST** stop sending MLR for the documents it responds to
118 via MLS. (March 1st, 2027 – defined in [MLS Phase-in])
- 119 • **T3:** MLS sending becomes mandatory for all SPs. SLRs become enforceable as
120 well. MLR sending permitted only as last-resort fallback where C2 has no MLS
121 receiving capability registered in SMP. MLR specification deprecated. (April 1st,
122 2027 – defined in [MLS Phase-in])
- 123 • **T4:** MLR fully retired. An SP **MUST NOT** send MLR. No SP is allowed to receive
124 MLR. Maximum one month after T3. (May 1st, 2027)

125 The main action items between the milestones are as follows:

- 126 • **Phase 2, between T2 and T3 (1 month):**
 - 127 ○ SPs activating MLS sending **MUST** immediately cease sending MLR
 - 128 ○ SPs not yet sending MLS **SHOULD** prepare to stop sending MLR
- 129 • **Phase 3, between T3 and T4 (1 month):**
 - 130 ○ MLR sending permitted only as last-resort fallback (C2 with no MLS
 - 131 capability registered in SMP)
 - 132 ○ MLR receiving capabilities may be started to be removed
 - 133 ○ C3 **MUST** verify via SMP lookup before using the MLR fallback
 - 134 ○ This window runs for a maximum of 1 month until **T4**
 - 135 ○ eDEC Code List entry for MLR is marked as “deprecated”
- 136 • **From T4:**
 - 137 ○ MLR fully retired; sending prohibited; receiving no longer required
 - 138 ○ eDEC Code List entry for MLR is marked as “removed”

1394 Intended Impact for different Actors

140 This section summarises the anticipated activities for each actor during the MLR phase-
141 out.

142 4.1 Peppol Service Providers

143 Timeline perspective of the necessary MLR phase-out activities for Peppol Service
144 Providers. The transition is driven by the SPOG priority rule: MLS has priority over MLR
145 from the moment MLS sending is activated on any given SP.

146 4.1.1 Phase 2 (T2 to T3)

147 The phase-out starts immediately upon full MLS activation:

- 148 • The MLR phase-out is not deferred to **T3**. It begins at **T2** because the SPOG
149 priority rule is binding from the moment MLS sending is activated on any given SP.
- 150 • An SP that activates MLS sending during this phase **MUST** immediately cease
151 sending MLR for the business documents it now responds to via MLS. These two
152 obligations are mutually exclusive per [SPOG MLS] section 3.2.
- 153 • By T3 all MLR document type registrations in SMP should be removed, as MLS
154 receiving must be activated per **T2** and MLS sending is mandatory by **T3**.
155 Retaining these registrations after MLS is active creates potential for compliance
156 ambiguity. Maintain the ability to accept and process inbound MLR messages only
157 from selected counterpart SPs that have not yet completed their transition.
- 158 • During this period, SPs that have not yet activated MLS sending **MAY** still send
159 MLR but **SHOULD** be preparing to stop.
- 160 • All SPs must be prepared to stop sending MLR entirely. There is no general grace
161 period beyond **T3**. Retain MLR document type registrations under End User
162 participant identifiers only where explicitly required, and document this clearly.

163 4.1.2 Phase 3 (T3 to T4)

164 MLR sending ends for all normal cases:

- 165 • From **T3**, all SPs **MUST** be sending MLS.
- 166 • The only remaining permitted use of MLR during this phase is as a last-resort
167 fallback, limited strictly to the case where C2 has not registered MLS receiving
168 capability in SMP.
- 169 • Because MLS receiving capability is mandatory from **T2**, this case must be treated
170 as exceptional and extremely rare.
- 171 • C3 **MUST** verify via SMP lookup before falling back to MLR.

172 4.1.3 From T4 onwards

173 MLR is retired:

- 174 • All MLR sending is prohibited without exception.
- 175 • No SP is allowed to receive MLR messages.

176 **4.2 OpenPeppol Operating Office**

177 4.2.1 Before T3

178 Publish a formal MLR deprecation announcement and communicate the phase-out
179 timeline to all Peppol Authorities and Service Providers.

180 4.2.2 At T3

181 Mark the MLR specification as deprecated in Peppol eDelivery documentation and the
182 eDEC Code Lists (with a removal date of **T4**).

183 4.2.3 At T4

184 Formally retire the MLR specification.

185 **4.3 Peppol Authorities**

186 Peppol Authorities should act according to the following milestones.

187 4.3.1 Before T2

- 188 • Communicate the MLR phase-out timeline to all SPs within the Authority's
189 jurisdiction. Key messages: MLR sending ends progressively from **T2** as MLS is
190 activated, ends for all normal cases at **T3**, and the last-resort fallback closes at **T4**.
- 191 • Coordinate with software vendors operating in the jurisdiction to align MLR end-of-
192 support with **T4**.

193 4.3.2 Before T3

- 194 • Support SPs in ceasing MLR sending as they activate MLS.
- 195 • For Centralised SMP offerings: remove MLR document type registrations from
196 centrally managed SPIS participant identifiers as each SP's MLS capability is
197 registered.

198 4.3.3 At T3

- 199 • Confirm with all SPs in jurisdiction that MLR sending has stopped for all normal
200 cases.
- 201 • Identify any SPs that have not yet activated MLS sending and escalate as non-
202 compliance with PNP Rule MLS-1.

203 4.3.4 At T4

- 204 • Remove any remaining MLR registrations from Centralised SMP offerings.

205

- Confirm with SPs that MLR receiving infrastructure decommissioning is underway.