

Payment Working Group – June 2025

Agenda

- Competition rules reminder
- Status of PSR / PSD3 adoption
- PSR / PSD3 PA Action Plan
- AOB





Competition and compliance rules

DO'S:

- Ensure business contacts with competitors have a legitimate purpose and are supervised by the FCE Secretariat.
- If discussions go off-topic or are anti-competitive: change the subject, leave, and report the incident.
- Review agendas, follow them, and keep approved meeting minutes.
- Keep social interactions with competitors non-business related.
- Discuss general industry issues, publicly available info, and non-sensitive topics.

DON'TS:

- Do not discuss sensitive commercial strategies with competitors (pricing, marketing, target markets, etc.).
- Avoid sharing forward-looking, recent, or competitive data without FCE Secretariat's prior written consent.
- Do not use FCE premises for unofficial business activities outside of the official program.
- Do not engage in exclusionary practices or collective boycotts.



Status of the PSR / PSD3 adoption

PSR/PSD 3 – Council General Approach – adopted on 18 June

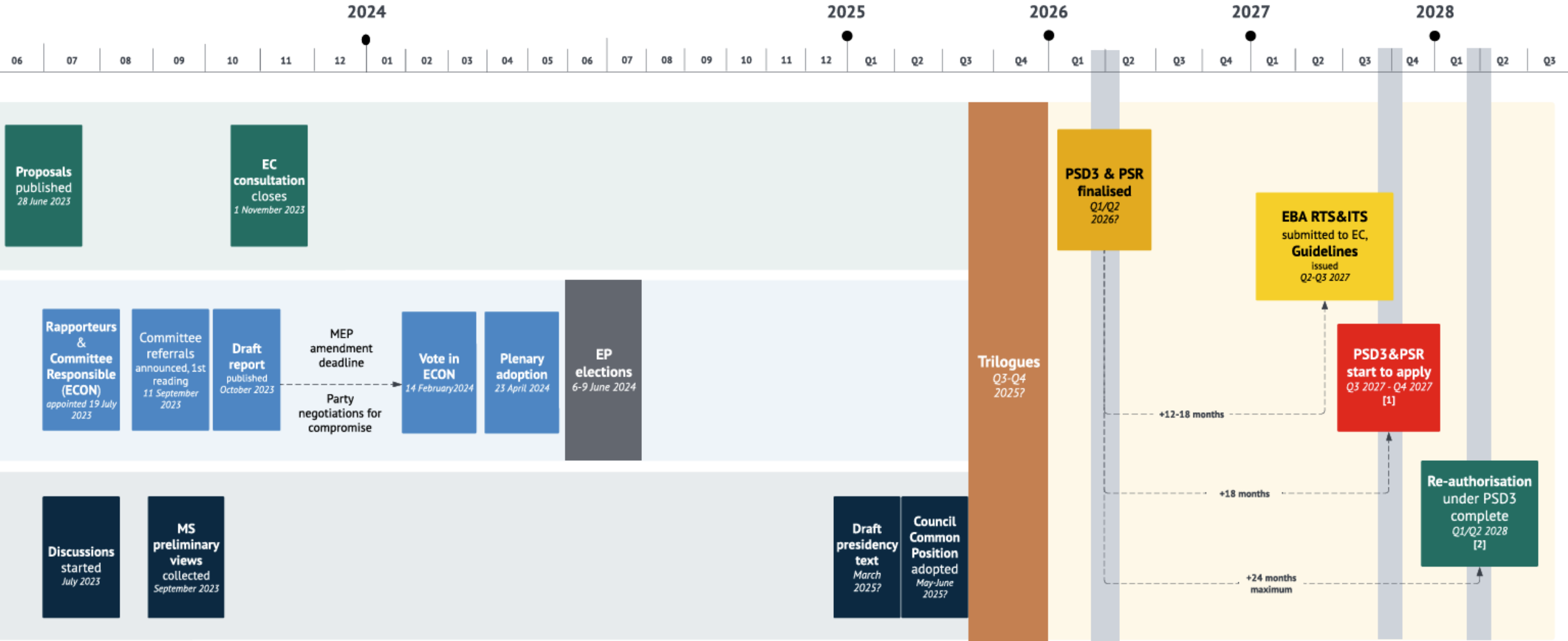
- Council negotiations at working party level concluded on 11 June.
- Key topics in final discussions:
 - Fraud prevention: establishment of cooperation platform involving all actors in the payment value chain
 - Transparency of card fees: greater clarity on scheme, acquiring and interchange fees
- **Presidency's proposed amendment to Article 39 PSD3:**
 - Makes the notification process optional, at the discretion of Member States

Next steps: Trilogue negotiations to begin in July

- Expected completion: December 2025 (per Commission's official)

PSD3 & PSR expected timeline

January 2025



[1] Member States have 18 months to implement PSD3 into national law and majority of PSR provisions are intended to apply 18 months after PSR entry into force. There are limited exemptions to the general 18 month application date.

[2] The Council draft text proposes to extend the PSD3 re-authorisation timeline to 30 months (from 24 months).

Presidency's proposed amendments to Article 39 PSD3

1. Member States shall require service providers that carry out either of the activities referred to in Article 2(1), points (j), (i) and (ii), of Regulation XXX [PSR] or carrying out both activities, for which the total value of payment transactions executed over the preceding 12 months exceeds EUR 1 million, to inform the competent authorities about the services offered, specifying under which exclusion as referred to Article 2(1), points (j), (i) and (ii), of Regulation XXX [PSR] the activity is considered to be carried out.

On the basis of that notification, the competent authority shall take a duly motivated decision on the basis of criteria referred to in Article 2(1), point (j), of Regulation XXX [PSR] where the activity does not qualify as a limited network, and inform the service provider thereof.

1. Member States **may shall** require service providers that carry out either of the activities referred to in Article 2(~~1~~2), points (j), (i) and (ii), of Regulation XXX [PSR] or carrying out both activities, for which the total value of payment transactions executed over the preceding 12 months exceeds EUR 1 million, to inform the competent authorities about the services offered, specifying under which exclusion as referred to Article 2(~~1~~2), points (j), (i) and (ii), of Regulation XXX [PSR] the activity is considered to be carried out.

Insofar Member States require service providers to notify pursuant to subparagraph 1, o On the basis of that notification, the competent authority shall take a duly motivated decision on the basis of criteria referred to in Article 2(~~1~~2), point (j), **(i) and (ii)** of Regulation XXX [PSR] where the activity does not qualify as a limited network, and inform the service provider thereof.

Presidency's proposed amendments to Article 39 PSD3

2. {...}

3. Member States shall ensure that competent authorities shall inform the EBA of the services notified pursuant to paragraph 1, stating under which exclusion the activity is carried out.

4. The description of the activity notified under paragraphs 2 and 3 shall be made publicly available in the registers referred to in Articles 17 and 18.

2. {...}

34. Insofar Member States require service providers to notify pursuant to paragraph 1, Member States shall ensure that competent authorities shall inform the EBA of the services notified pursuant to paragraph 1, stating under which exclusion the activity is carried out.

45. Insofar Member States require service providers to notify pursuant to paragraphs 1 and 2, the description of the activity notified under paragraphs 2 and 3 shall be made publicly available in the registers referred to in Articles 17 and 18.



PSR / PSD3 PA Action Plan

On-going

- Update of *“Tracker Fuel Cards status under PSD2”*
- Current collection of members’ replies to questionnaire on LNE notification requirements
- Promotion of position paper *“PSD review and application to fleet cards”* to prepare the trilogue

Upcoming

- Finalisation and promotion of the position paper *“Streamlining LNE notification requirements and assessments for greater convergence”* to DG FISMA and EBA ? → *to be reassessed following Article 39 amendments proposals*

PSR / PSD3 PA Action Plan – contacts

Name	Role	Country/Party	Email	Comments	Date Contacted	Actions	Follow Up Email	Follow Up
Parliament								
Morten Løkkegaard	MEP	RE - Denmark	morten.lokkegaard@europarl.europa.eu	Rapporteur PSD3	22/05/2025	Forwarded request to his APA - Jonas Ruhoff		
Lidia Pereira	MEP	EPP - Portugal	lidia.pereira@europarl.europa.eu	Shadow	22/05/2025	Reminder 06/06/25		
René Repasi	MEP	S&D - Germany	rene.repasi@europarl.europa.eu	Rapporteur PSR	22/05/2025	Reminder 06/06/25		
Ondřej Kovařík	MEP	PfE - Czech Republic	ondrej.kovarik@europarl.europa.eu	Shadow	22/05/2025	Reminder 06/06/25		
Marlena Malag	MEP	ECR - Poland	marlena.malag@europarl.europa.eu	Shadow	22/05/2025	Reminder 06/06/25		
Virginijus Sinkevičius	MEP	Greens/EFA - Lithuania	virginijus.sinkevicius@europarl.europa.eu	Shadow	22/05/2025	Reminder 06/06/25		
Jussi Saramo	MEP	GUE/NGL - Finland	jussi.saramo@europarl.europa.eu	Shadow	22/05/2025	Declined meeting request.		
René Aust	MEP	ESN - Germany	rene.aust@europarl.europa.eu	Shadow	22/05/2025	Reminder 06/06/25		
Jonás Fernández	MEP	S&D - Spain	jonas.fernandezalvarez@europarl.europa.eu	ECON coordinator	22/05/2025	Redirected us to MEP Repasi.		
Stéphanie Yon-Courtin	MEP	RE - France	stephanie.yon@europarl.europa.eu	ECON coordinator	22/05/2025	Redirected us to MEP Lokkegaard		
Council								
Robert Kolakowski	MS Attaché	Poland	robert.kolakowski@msz.gov.pl	Met FCE in Jan. 24	13/03/2025	Declined meeting but willing to receive a position paper	22/05/2025, sharing new position paper and meeting request	Reminder 06/06/25
Julia Weismann Fernandes Seixas	MS Attaché - Counsellor for	Denmark	juseix@um.dk		13/03/2025	No reply	23/05/2025, sharing new position paper and meeting request	Acknowledge receipt of position paper but declined meeting invitation.
Gertjan van Gastel	MS Financial Attaché	Belgium	Gertjan.vanqastel@diplobel.fed.be		13/03/2025	Declined meeting but willing to receive a position paper	22/05/2025, sharing new position paper and meeting request	Acknowledge receipt of position paper but declined meeting invitation.
Reinout Temmerman	Payment advisor from the National Bank	Belgium	reinout.temmerman@nbb.be		13/03/2025	Declined meeting but willing to receive a position paper	22/05/2025, sharing new position paper and meeting request	Acknowledge receipt of position paper but declined meeting invitation.
Fabian Brunner	Financial Services Attaché	Germany	fin-d-2-eu@brue.diplo.de	Met FCE in Feb. 24	13/03/2025	No reply	22/05/2025, sharing new position paper and meeting request	Reminder 06/06/25
Sebastian Tomasius	Head of Financial Services Unit	Germany						
National Ministries / Council								
Mr Nýdrle	Ministry	Czech Republic		Contact managed directly by Eurowag				
Mrs. Baryšková	Ministry	Czech Republic		Contact managed directly by Eurowag				
Martina Petrusova	MS Attaché	Czech Republic	martina.petrusova@mzv.cz	Contact managed directly by Eurowag				
?	Ministry	Poland		Contact managed directly by E100				
David Revelin	MS Attaché	France		Contact managed directly by Edenred				
Clara Paoloni	MS Attaché	France		Contact managed directly by Edenred				
European Commission								
Eric Ducoulombier	DG FISMA - Head of unit B.3 Retail financial services		eric.ducoulombier@ec.europa.eu		13/03/2025		22/05/2025, sharing new position paper and meeting request	Will carefully consider position paper but declined meeting invite due to tight schedule before the summer break.
Andrea Liesenfeld	DG FISMA - Deputy head of unit B.3 Retail financial services		andrea.liesenfeld@ec.europa.eu		13/03/2025			
Céu Pereira	DG FISMA - Team leader Retail payment unit B.3		Ceu.Pereira@ec.europa.eu		13/03/2025		22/05/2025, sharing new position paper and meeting request	
Michał Kwiatkowski	DG FISMA - Unit B3 Retail payment unit - Policy Office		Michal.KWIATKOWSKI@ec.europa.eu			Informal phone call on 10/04/2025	11/05/2025 - sharing FCE pp of November 2022 on LNE notification requirements	
Larisa Tugui	DG FISMA - Unit B3 Retail payment unit - Senior Policy Officer		Larisa.TUGUI@ec.europa.eu					



PSR / PSD3 PA Action Plan

Mapping of EU-level Trade Association Positions

Association	Key Position(s)	Specific Focus Areas
UPEI	Supports recognition of fuel cards as non-payment instruments	<ul style="list-style-type: none"> - Specific-purpose instrument in reselling chain - Art. 39: declaration threshold based on total net value over €1 million
EuroCommerce	Calls for harmonised interpretation of LNE	- Consistent treatment across MS
	Calls for greater transparency on fees (acquiring, interchange) and their limitation	<ul style="list-style-type: none"> - Calls for regulatory intervention on fees - Support for retailer surcharging customers for the use of certain payment instruments
PaymentsEurope	Addressing fraud remains top 1 priority	- Safety and security
MasterCard (lawyer)	Raises concerns over fee limitations	- Fee caps in PSD3/PSR and MiFID
	Expresses dissatisfaction over EBA 2022 Guidelines	- Concerns about restrictions on multiple instruments (LNE or not) on the same device



AOB / open discussion

- AOB : Any other question you would like to raise with the group?

- Payment working group calendar :

July 17th at 10 am CEST

September 11th at 10 am CEST

October 16th at 10 am CEST

December 4th at 10 am CET