

Payment WG Meeting

Minutes

17 July 2025



Minutes and Actions

Meeting of the Fleet Cards Europe Payment Working Group

17 July 2025, 10:00 am (CEST)

Location	Online	
Chair	Delphine Chilese-Lemarinier, Edenred	
Attendance	Leon Carford, Radius Antonio Chiesa, DKV Pauline Gain, Edenred Louis van den Heuvel, Corpay Vashti Higgins, Cardtrend Frank Hock, DKV Ondřej Jančařík, Eurowag Diana Jescanina, E100 Frank van Loon, TFC Ulf Marquardt, DKV Vladimir Štrbavý, MOL	Secretariat: Aurélie Decker Peigneur, FCE
Apologies	Louis van den Heuvel, Corpay	
Content	<ol style="list-style-type: none">1. Competition compliance reminder2. Status of PSR/PSD3 adoption3. PSR / PSD3 PA Action Plan4. AOB	

1) Competition compliance reminder

FCE Secretary General reminded all participants to comply with competition law and circulated the Do's and Don'ts.

2) Status of PSR/PSD3 adoption

- The Secretary General reminded participants that the Council adopted its General Approach on 18 June. As a result, trilogue negotiations kicked off on 10 July. Based on available information, all discussions related to reporting requirements—including Article 39 of PSD3—have been identified by the Council as politically sensitive, though potentially

solvable through technical solutions. The next trilogue is scheduled for September, and negotiations are still expected to conclude by the end of 2025.

- E100 drew participants' attention to a response from the European Commission, published on the EBA's website on 11 July. In the statement, the Commission concludes that fuel cards should be considered payment instruments, as they meet the two conditions: (1) being a personalised payment instrument and (2) being used to initiate a payment order. While this interpretation is not legally binding, participants agreed on the importance of conducting a thorough analysis to assess the potential implications and determine the appropriate steps to respond effectively.

Action

The Secretariat will continue to closely monitor discussions related to the adoption of the PSR/PSD3.

Members will conduct an in-depth analysis of the European Commission's response qualifying fuel cards as a payment instrument. This topic will be discussed collectively during a dedicated meeting scheduled for 19 August.

3) PSR/PSD3 PA Action Plan

- The Secretary General informed participants that since the last meeting, meeting requests were sent to the identified contacts to promote the position paper "*PSD Review and Application to Fleet Cards*" in preparation for the trilogue. To date, only representatives from the German Permanent Representation have responded positively.
- An online meeting was held on 17 July with Fabian Brunner, Financial Services Attaché at the Permanent Representation of Germany to the EU, and Simon Skipka, Policy Officer at the German Federal Ministry of Finance, where he leads the Payments team. FCE was represented by its Secretary General, alongside representatives from DKV and UTA/Edenred.

Overall, participants agreed that it was a constructive and productive meeting, demonstrating that the German representatives have a clear understanding of FCE's position. The key takeaways from the meeting are as follows:

- Both representatives confirmed that their interpretation—and that of BaFin—is that fuel cards do not qualify as payment instruments.
- In response to FCE's request to reaffirm the exclusion of fleet cards by adding a dedicated paragraph to Article 2.2 of the PSR, they expressed strong reservations. Member States are generally reluctant to include specific, sectoral or business model-based exemptions. As such, such an amendment appears very unlikely.
- The German representatives confirmed that Germany has actively pushed for the deletion of Article 39. Their view is that the current notification process primarily impacts compliant actors, provides limited additional oversight value, and that alternative tools exist to supervise non-compliant undertakings. This view seems to be supported by a majority of Member States. However, some continue to see

- value in the information gathered through the notification process, which led to the compromise amendment proposed by the Polish Presidency.
- Germany plans to continue advocating for the deletion of Article 39 during trilogue negotiations. They believe that, in the spirit of simplification, the European Parliament may be supportive of this position. They also expressed interest in receiving more information from FCE on the challenges and inconsistencies faced by fuel card companies across Member States under the current notification regime. Furthermore, they encouraged FCE to engage directly with MEPs on this topic.
 - In the event that deletion of Article 39 is not achievable, the German representatives showed interest in the proposal to promote a negative passporting mechanism. Under this approach, no additional assessment would be required by host Member States if a company has already undergone a notification assessment by the competent authority of its home Member State for the same business model. They indicated they would look into this option further, considering it could be a viable secondary solution.
- The Secretary General also reported having reached out to three EU trade associations to explore their interest in forming a coalition on the PSR/PSD3 file. The European Confederation of Fuel Distributors (ECFD) appeared receptive to the idea, and the Secretary General indicated that its German member, UNITI, will reach out to FCE's German members to further discuss the matter. A meeting with UPEI is scheduled for 17 July, while no response has yet been received from ChargeUp Europe.
 - Based on the discussion and information shared, participants agreed to renew efforts to engage with the European Parliament, specifically by seeking meetings with policy officers from the political groups responsible for financial services. It was also considered worthwhile to reach out to the financial attachés of the 13 Member States whose national competent authorities (NCAs) have concluded that fuel cards are not payment instruments.
 - Members agreed to revise the recommendations outlined in the position paper titled "*Need for Harmonisation of LNE Notification*" in line with the proposals discussed during the meeting with the German representatives, and to share the updated version with them.
 - While FCE members analyse the European Commission's response classifying fuel cards as payment instruments (see Section 2 above), the position paper "*PSD Review and Application to Fleet Cards*" will be temporarily put on hold.

Action

The Secretariat will:

- continue assessing the willingness of ECFD, UPEI, and ChargeUp Europe to form a coalition on the PSR/PSD3 file.
- Send meeting requests for September to the newly identified stakeholders in the European Parliament and the Council.

- circulate a revised version of the draft position paper “*Need for Harmonisation of LNE Notification*” incorporating the new recommendations, for adoption by Members by end of business on 18 July.

4) AOB

The next WG ordinary meeting is scheduled to take place online on 11 September at 10 am CEST.

A separate meeting, dedicated to analysing the European Commission’s response qualifying fuel cards as a payment instrument, is scheduled for 19 August at 10:00 CEST.