

Payment Working Group – July 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

Council General Approach – adopted on 18 June

Trilogue negotiations launched on 10 July

- Reporting requirements (incl. Art. 39) identified by the Council as a politically sensitive issue, with potential for a technical solution; to be discussed at the technical level
- Next trilogue meeting scheduled for September

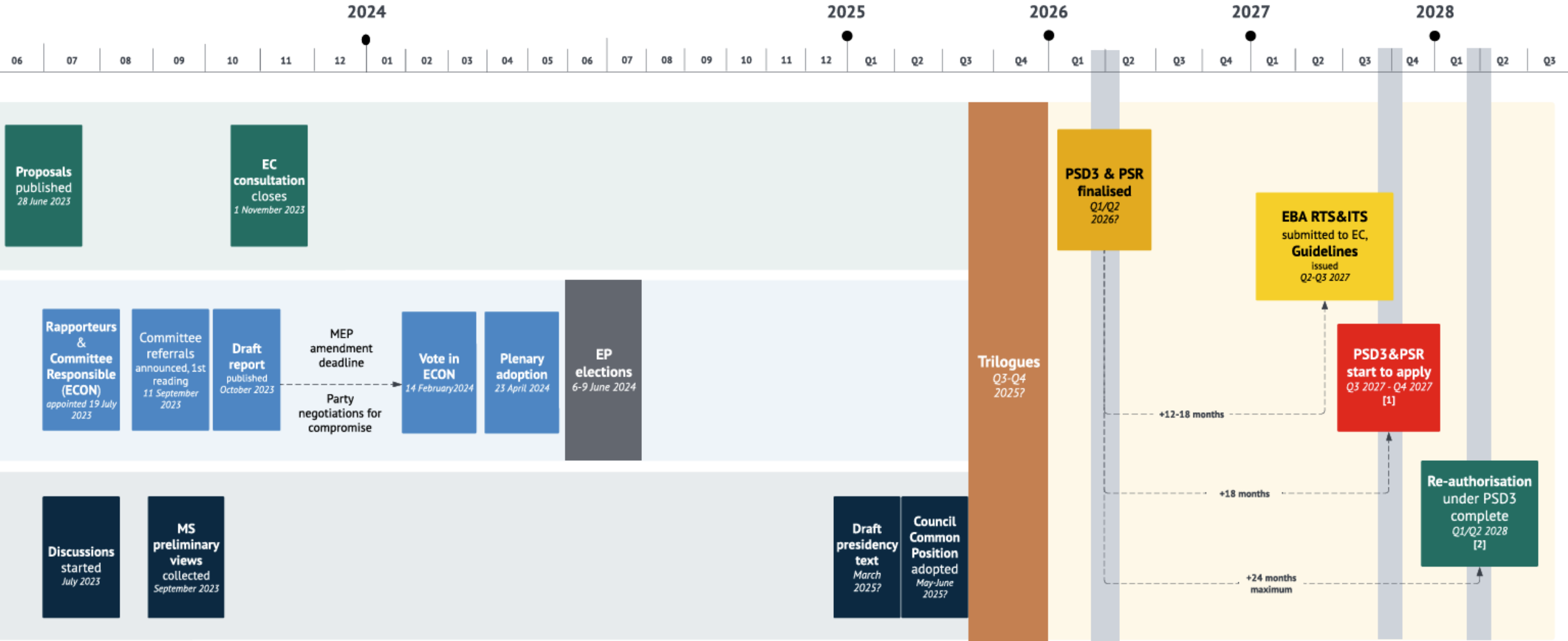
Expected completion: December 2025 (per Commission's official)

! European Commission's answer on the status of fuel cards as payment instrument published on 11 July 2025

[2023_6910 Interpretation of payment instrument | European Banking Authority](#)

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).



PSR / PSD3 PA Action Plan

Since last meeting

- Meeting request sent to the identified contact to promote the position paper *“PSD Review and Application to Fleet Cards”* in preparation for the trilogue
- Meeting held with the German Permanent Representation on 17 July
- Ongoing discussions with UPEI, the European Confederation of Fuel Distributors (ECFD), and ChargeUp Europe to explore interest in forming a coalition

Upcoming

- Finalisation and promotion of the position paper *“Streamlining LNE notification requirements and assessments for greater convergence”*

PSR / PSD3 PA Action Plan – contacts

Name	Role	Country/Party	Email	Comments	Date Contacted	Actions	Follow Up Email	Follow Up
Parliament								
Morten Lokkegaard	MEP	RE - Denmark	morten.lokkegaard@europarl.europa.eu	Rapporteur PSD3	22/05/2025	Forwarded request to his APA - Jonas	Ruhoff. Acknowledged our request to discuss art 39 amdots.	
Lidia Pereira	MEP	EPP - Portugal	lidia.pereira@europarl.europa.eu	Shadow	22/05/2025	Reminder 06/06/25	New meeting invitation sent on 01/07/25 focused on art 39 amdots.	
René Repasi	MEP	S&D - Germany	rene.repasi@europarl.europa.eu	Rapporteur PSR	22/05/2025	Reminder 06/06/25	New meeting invitation sent on 01/07/25 focused on art 39 amdots.	
Ondřej Kovářik	MEP	PfE - Czech Republic	ondrej.kovarik@europarl.europa.eu	Shadow	22/05/2025	Reminder 06/06/25	New meeting invitation sent on 01/07/25 focused on art 39 amdots.	
Marlena Malaq	MEP	ECR - Poland	marlena.malaq@europarl.europa.eu	Shadow	22/05/2025	Reminder 06/06/25	New meeting invitation sent on 01/07/25 focused on art 39 amdots.	
Virginijus Sinkevičius	MEP	Greens/EFA - Lithuania	virginijus.sinkevicius@europarl.europa.eu	Shadow	22/05/2025	Reminder 06/06/25	New meeting invitation sent on 01/07/25 focused on art 39 amdots.	
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	New meeting invitation sent on 01/07/25 focused on art 39 amdots.	
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@mzv.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. New meeting invitation sent on 01/07/25 focused on art 39 amdots.
Julia Weismann Fernandes Seixas	MS Attaché - Counsellor for Financial Services	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. New meeting invitation sent on 01/07/25 focused on art 39 amdots.
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. New meeting invitation sent on 01/07/2025 focused on art 39 amdots.
Reinout Temmerman	Payment advisor from the National Bank Financial Services	Belgium	reinout.temmerman@nbb.be		13/03/2025			
Fabian Brunner	Attaché	Germany	fin-d-2-eu@brue.diplo.de	Met FCE in Feb. 24	13/03/2025	Meeting on July 10		
Sebastian Tomasius	Head of Financial Services Unit	Germany						
National Ministries / Council								
Mr Nýdrie	Ministry	Czech Republic		Contact managed directly by Eurowag				
Mrs. Bařýřková	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 s		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	
Michal 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 Tuoui	DG FISMA - Unit B3 Retail payment unit - Senior Polic		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 :

September 11th at 10 am CEST

October 16th at 10 am CEST

December 4th at 10 am CET