

# Payment Working Group – September 2025

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## Agenda

- Competition rules reminder
- Status of PSR / PSD3 adoption
- PSR / PSD3 PA Action Plan
- EC response to Question 2023\_6910 (PSD2 Art. 4(14))
- 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

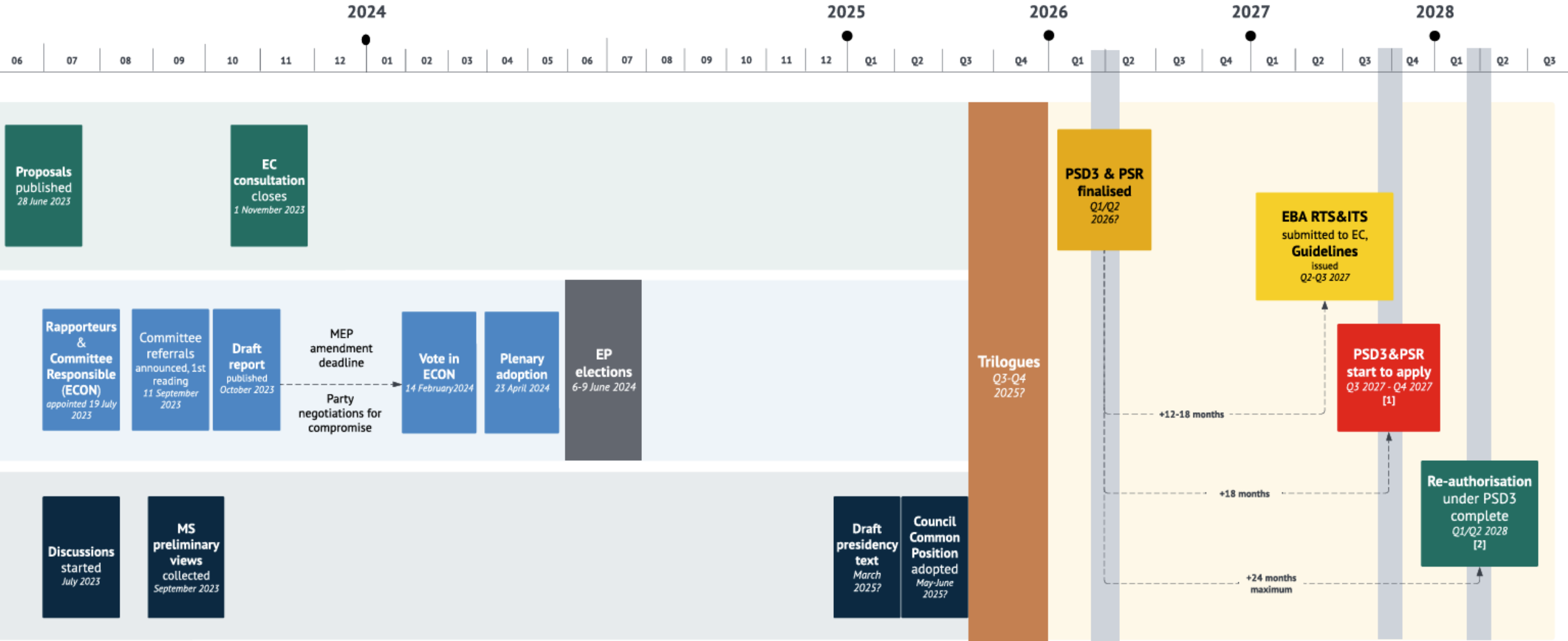
**Trilogue meeting held 1<sup>st</sup> week of September**

- To our knowledge, discussions so far have focused primarily on fraud-related issues
- Next trilogue meeting expected to address: fraud, consumer protection, cash withdrawals and Art 1-3 of PSR (subject matter, scope, definitions)

**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).



# PSR / PSD3 PA Action Plan

## Since last meeting

- Meeting requests sent to European Parliament political groups counsellors (EPP, RE, S&D, ECR, Greens, GUE/NGL).
- Meeting requests sent to a broader list of Member States Representatives in Brussels.
- Meeting held with the **Luxembourg Permanent Representation** on **2 September**.
- Ongoing discussions with UPEI, the European Confederation of Fuel Distributors (ECFD) to explore interest in forming a coalition.

## Upcoming

- Send reminder for pending meeting requests
- Follow up with the Luxembourg Financial Attaché





# EC response to Question 2023\_6910 (PSD2 Art. 4(14))

- **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](#)

- Meeting request sent to DG FISMA
- **FCE position:**

Currently unclear whether the Commission's reply applies to the business models of FCE members. Further information and analysis required.



# AOB / open discussion

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

**October 16<sup>th</sup> at 10 am CEST**

December 4<sup>th</sup> at 10 am CET