

Payment WG Meeting

Minutes

16 October 2025



Minutes and Actions

Meeting of the Fleet Cards Europe Payment Working Group

16 October 2025, 10:00 (CEST)

Location	Online	
Chair	Delphine Chilese-Lemarinier, Edenred	
Attendance	Leon Carford, Radius Antonio Chiesa, DKV Vashti Higgins, Cardtrend Frank Hock, DKV Ondřej Jančařík, Eurowag Louis van den Heuvel, Corpay Frank van Loon, TFC Guillaume Moleins, Edenred Roland Schwengebecher, Edenred	Secretariat: Aurélie Decker Peigneur, FCE
Apologies	Pauline Gain, Edenred Vicky Lloyd, WEX	
Content	<ol style="list-style-type: none">1. Competition rules reminder2. Status of PSR/PSD3 adoption3. Update on PSR / PSD3 PA Action Plan4. EC response to question 2023_6910 (PSD Art.4 (14))5. AOB	

1) Competition rules reminder

FCE Secretary General reminded all participants to comply with competition law.

2) Status of PSR/PSD3 adoption

- The Secretary General informed participants that the next trilogue meeting is scheduled for 23 October. Based on the information available, the agenda is expected to focus on transparency and fees, agents, and certain technical simplification items. At this stage, no discussion is foreseen on articles directly relevant to FCE.



- In addition, several observers have indicated that the December 2025 deadline may not be met, and trilogue negotiations are now likely to conclude under the Cypriot Presidency in early 2026.

3) Update on PSR/PSD3 PA Action Plan

- The Secretary General informed participants that since the last meeting, FCE and UPEI have agreed on a joint statement entitled *“Towards a coherent EU regulatory framework for fleet cards – A joint FCE & UPEI call for clarity and harmonisation under PSR and PSD3.”*.
- Members discussed the dissemination strategy for this joint paper and agreed that it should be shared with:
 - previously identified Members of the European Parliament (MEPs),
 - political group counsellors in the European Parliament, and
 - Financial Attachés of Member States.

In particular, regarding Mr. Wirtz (Luxembourg Financial Attaché), the Secretary General will use the opportunity of sharing the joint statement to request an update on the call to simplify the LNE notification process and assess his willingness to act as a potential advocate for these concerns.

- Concerning outreach to the European Parliament, it was suggested that dissemination may be more impactful if companies based in the relevant MEPs’ home countries send a separate request, as this could increase interest and the likelihood of securing meetings. The Secretary General will coordinate with members willing to engage their national MEPs and will prepare a draft email to ensure alignment and consistency in the messaging.
- Members agreed that, given the technical nature of the topic and its relevance mainly to a specialist audience, the joint position paper will not be published on the FCE website. Instead, FCE will prepare a LinkedIn post explaining how fleet cards work in a more accessible and positive way, focusing on what fleet cards are and their characteristics. The Secretary General will also review the website to ensure it conveys clear and positive messaging.

Action

The Secretariat will liaise with UPEI to align on the dissemination plan and proceed once agreement is confirmed.

The Secretariat will coordinate with members willing to contact their national MEPs.

The Secretariat will prepare a draft LinkedIn post on how fleet cards work and circulate it to members for feedback prior to publication.

4) EC response to question 2023_6910 (PSD Art.4 (14))

- The Secretary General informed participants that, following several meeting requests, the European Commission’s DG FISMA had initially agreed to receive FCE’s concerns and request for clarification in writing. After review, FCE decided not to proceed with the written

submission, and DG FISMA subsequently agreed to hold a meeting instead. The Secretary General is currently liaising with members who expressed interest in participating, with the objective of setting a date as soon as possible.

- The Secretary General also reached out to Paysys, sharing FCE's assessment that the question at stake does not relate to a typical fleet card business model and therefore should not impact its current classification. In parallel, contact was made with Jimmie Franklin, a specialised journalist covering payment services regulation, to exchange views on the European Commission's response.
- As previously requested, and with the aim of preparing for upcoming discussions, the Secretary General suggested eight questions for an internal Q&A document addressing the technical aspects raised by question 2023_6910:
 1. What is the typical business model for a fuel card?
 2. Under PSD2, does a fuel card qualify as a payment instrument as defined in Article 4(14)?
 3. Are fuel cards considered personalised devices or a set of procedures under PSD2?
 4. Does a fuel card initiate a payment order?
 5. Does the operation of a fuel card service require authorisation as a payment service provider (PSP) under PSD2?
 6. Under what circumstances must a fuel card scheme be notified to a national competent authority (NCA)?
 7. Can the Limited Network Exclusion (Article 3(k) of PSD2) apply to fuel cards, and what are the specific conditions for this exclusion?
 8. How does the European Commission's response to Question 2023_6910 impact the classification of fleet cards as non-payment instruments under PSD2?
- Participants agreed with the list of questions and tasked the Secretary General with drafting the document in a concise format, primarily to serve as a basis for discussions.
- There was no full alignment on the status of the document: some members preferred keeping it internal, while others considered that it could be shared with external experts when relevant. It was therefore agreed to first finalise the draft and revisit its status once completed.

Action

The Secretariat will schedule a meeting with DG FISMA.

The Secretariat will circulate a draft Q&A document on the classification of fuel cards under PSD2 ahead of the next meeting. Members will review the draft and indicate whether additional questions should be included to ensure comprehensive coverage of all relevant situations.

5) AOB

- The next WG meeting is scheduled to take place online on 4 December at 10 am CET.
- In addition, the meeting calendar for the first half of 2026 was shared with participants. Calendar invitations will be sent out shortly