

Payment Working Group – October 2025

Agenda

- Competition rules reminder
- Status of PSR / PSD3 adoption
- Update on 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

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 on 23 October

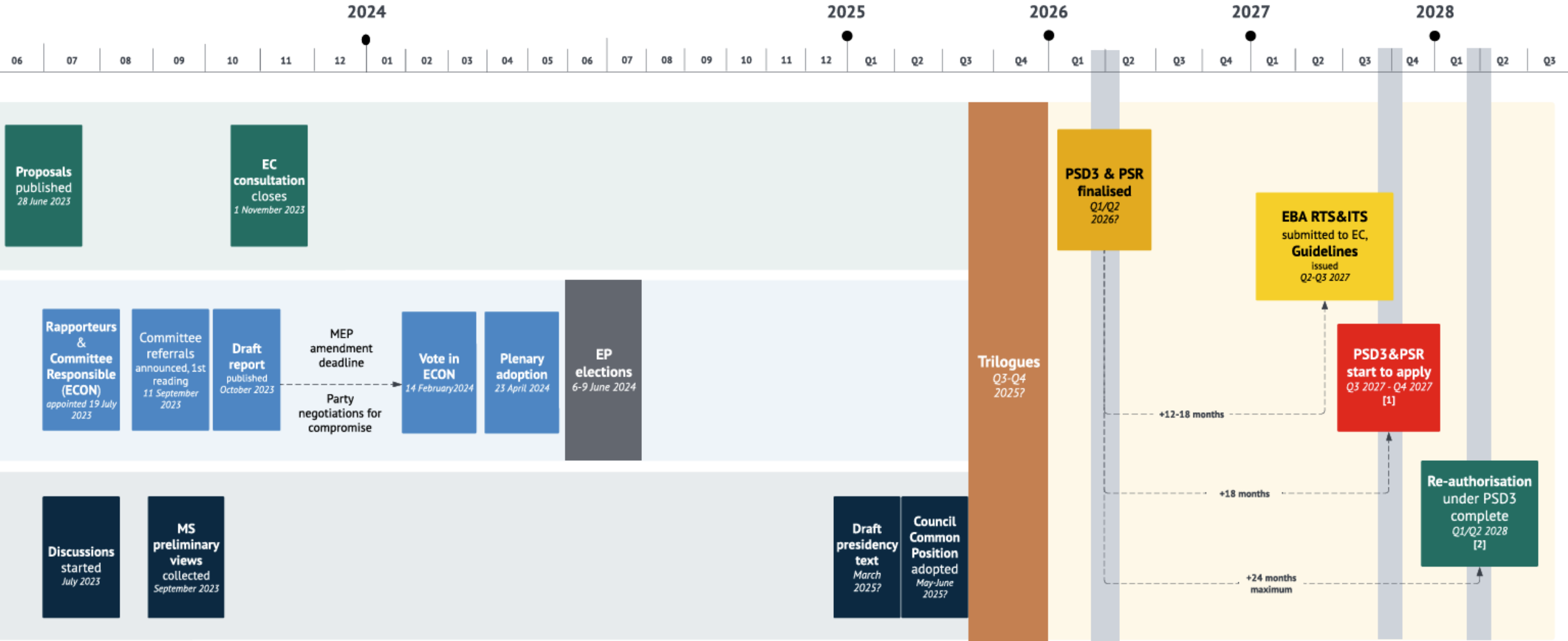
- Agenda: transparency & fees, agents and certain technical simplifications items.
- No discussion expected on articles relevant for FCE.

Expected timeline

- Some observers are indicating that the December 2025 deadline may not be met.

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

- Continued discussions with UPEI to agree on a joint statement.

Upcoming

- Requests to be send for a joint FCE/UPEI meeting:
 - to MEPs, and European Parliament political groups counsellors (EPP, RE, S&D, ECR, Greens, GUE/NGL),
 - to Permanent Representations.
- New follow up with the Luxembourg Financial Attaché.
- Public dissemination of FCE/UPEI joint statement?



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

FCE position:

- Unclear whether the Commission's reply applies to the business models of FCE members.
Further analysis required.

Follow-up

- DG FISMA agreed to meet with FCE (*date to be confirmed*).
- Exchanges with Paysys and journalist Jimmie Franklin (*journalist, meeting pending*).
- Q&A document on technical issues currently being drafted.



Q&A on fuel card classification under PSD2

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 art. 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 an authorization 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 answer on the status of fuel cards (Question 2023_6910) impact their classification as a non-payment instrument under PSD2?



AOB / open discussion

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

Payment working group calendar :

December 4th at 10 am CET

January 22nd at 10 am CET

March 12th at 10 am CET

April 23rd at 10 am CEST

June 4th at 10 am CEST

July 16th at 10 am CEST