

Payment WG Meeting

Minutes

4 December 2025



Minutes and Actions

Meeting of the Fleet Cards Europe Payment Working Group

4 December 2025, 10:00 (CET)

Location	Online	
Chair	Delphine Chilese-Lemarinier, Edenred	
Attendance	Leon Carford, Radius Antonio Chiesa, DKV Pauline Gain, Edenred Vashti Higgins, Cardtrend Ondřej Jančařík, Eurowag Diana Jescanina, E100 Louis van den Heuvel, Corpay Frank van Loon, TFC Guillaume Moleins, Edenred Jochem Raatgering, TankPool24 Roland Schwengebecher, Edenred Vladimír Štrbavý, MOL	Secretariat: Aurélie Decker Peigneur, FCE
Apologies	N/A	
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. Discussion on the Payment WG 2026 Roadmap6. 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 a political agreement was reached on 27 November. However, the final legislative text is not yet available, as technical work on the

overall package is still ongoing. As a result, the details of the agreement cannot yet be reviewed.

- It was noted that no clear indication has been obtained regarding further discussion on Article 39 PSD3. Based on the information available, it appears that the article was most likely not discussed at political level and will instead be addressed during technical negotiations.
- Formal adoption of the package by the co-legislators is expected during the first semester of 2026, although participants reported differing indications regarding the precise timing (Spring or Summer 2026). Once the final text is published in the Official Journal, an implementation period of 12 to 18 months is foreseen. It appears that the Council may be advocating for a longer transposition timeline, and that a provisional agreement around 21 months may have been reached—though this still requires confirmation. This would imply implementation by early to mid-2028.
- The Secretary General indicated that, during the transposition period, the European Banking Authority (EBA) is expected to draw on the experience gained from applying the Regulatory Technical Standards (RTS) on LNE to determine whether the adoption of new guidelines is warranted. Any such guidelines must be preceded by a public consultation conducted by the EBA.

3) Update on PSR/PSD3 PA Action Plan

- The Secretary General informed participants that, since the last meeting, the FCE/UPEI position paper had been broadly disseminated to Members of the European Parliament and various Permanent Representations. It was also reported that FCE held discussions with DG FISMA, and that Eurowag engaged with MEP Kubín and the Czech Ministry of Finance. Following the political agreement, additional outreach was conducted with several Permanent Representations to obtain the latest agreed texts and to clarify whether any substantive amendments remained under consideration.
- Participants discussed the LNE provisions and Article 39. Recent insights shared by Eurowag suggest that negotiators do not intend to reopen the LNE-related elements (PSR Art. 2(2)(j)(ii)), which are expected to remain aligned with the Parliament's position. Regarding PSD3 Article 39, several stakeholders anticipate that the final text will likely reflect the Council's wording, allowing Member States discretion on whether to introduce a notification requirement for Articles 2(2)(j)(i) and (ii). It was also noted that, although the European Commission is dissatisfied with the Council's approach on Article 39, it does not have the leverage to alter it at this stage. These conclusions remain provisional pending the technical agreement. Nevertheless, complementary information from other channels indicates that the outstanding technical work is expected to focus on ensuring coherence based on the texts adopted by the Parliament and the Council, rather than reopening politically sensitive points — a prospect the group viewed as broadly reassuring.
- Overall, the group concluded that, should the final text be confirmed in early 2026, the outcome would be broadly positive, as the primary objective of FCE—namely the confirmation of the LNE exemption—has been achieved. It was agreed that the group

should now shift its focus to the RTS, and begin preparing how these could be practically improved and optimised.

- Members also agreed that, in this next phase of advocacy, active local engagement through members will be essential. Given that the degree of openness among NCAs varies across Member States, national-level involvement will be important both to promote FCE's positions and to help build the necessary technical dialogue. Such efforts should be coordinated centrally through FCE to ensure consistency and maximise impact.

Action

The Secretariat will follow up in January 2026 with its contacts to obtain additional information on the final text and on Article 39.

The Secretariat will circulate the RTS ahead of the next meeting, enabling members to review the text, begin identifying areas for improvement, and outline a preliminary plan for the upcoming public consultation.

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

- The Secretary General informed participants that FCE met with DG FISMA on 20 November (see detailed minutes attached). DG FISMA did not share any contextual information on the original case and emphasized that the question in the Q&A is strictly related to PSD2, should be interpreted narrowly, and is applicable only to cases with similar patterns. It was also confirmed that National Competent Authorities (NCAs) had reviewed the question prior to its publication. During the meeting, DG FISMA noted that it would be possible to submit a new question to the EBA to clarify the treatment of typical fleet cards under PSD2.
- Participants shared that, overall, the meeting was reassuring, as DG FISMA did not place significant emphasis on the Q&A, and the NCAs did not react strongly to its publication. The issue is therefore no longer considered urgent or "burning." Members also agreed that it was not desirable to submit a new question to the EBA, given that PSD2 implementation will soon be superseded, the long procedural timeline, the uncertain outcome, and the potential risk of receiving an interpretation that could adversely affect the sector.
- It was consequently agreed and confirmed that the response to question 2023_6910, as it currently stands, does not apply to the business models of FCE members.

5) Discussion on the Payment Working Group 2026 Roadmap

- The group reviewed the results of the annual satisfaction survey for the Payment Working Group (*see slide deck*).
- The objective of the discussion was to launch the definition of the 2026 Roadmap. Across all working groups, two horizontal initiatives are already planned for 2026: a new intranet workspace (January 2026) and one annual in-person meeting in Brussels with external guests.

- A list of potential topics and three types of actions (monitoring / knowledge-building / influence) was shared to help prioritise work. Topics may move between categories during the year. Members requested time to reflect and will provide written feedback to the Secretariat.

Action

Members will send the Secretariat, by end-December, the topics they wish to include in the 2026 Roadmap, with a short description of the issue and suggested classification (Monitoring / Knowledge-building / Influence–Advocacy).

The Secretariat will circulate a draft 2026 Roadmap ahead of the next meeting so it can be discussed and adopted in early January.

6) AOB

- The Secretariat informs members that Uniti will be organising a [Mobility Payment Forum](#) in Hamburg on 14-15 January 2026.
- The next WG meeting is scheduled to take place online on 22 January 2026 at 10 am CET.