

# Payment Working Group – December 2025

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## 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))
- Discussion on the Payment WG 2026 Roadmap
- 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

## Political agreement – Status update

- Political agreement reached on 27 November
- Legislative text not yet available
- Technical work on the package continues prior to formal adoption

## Outstanding issue

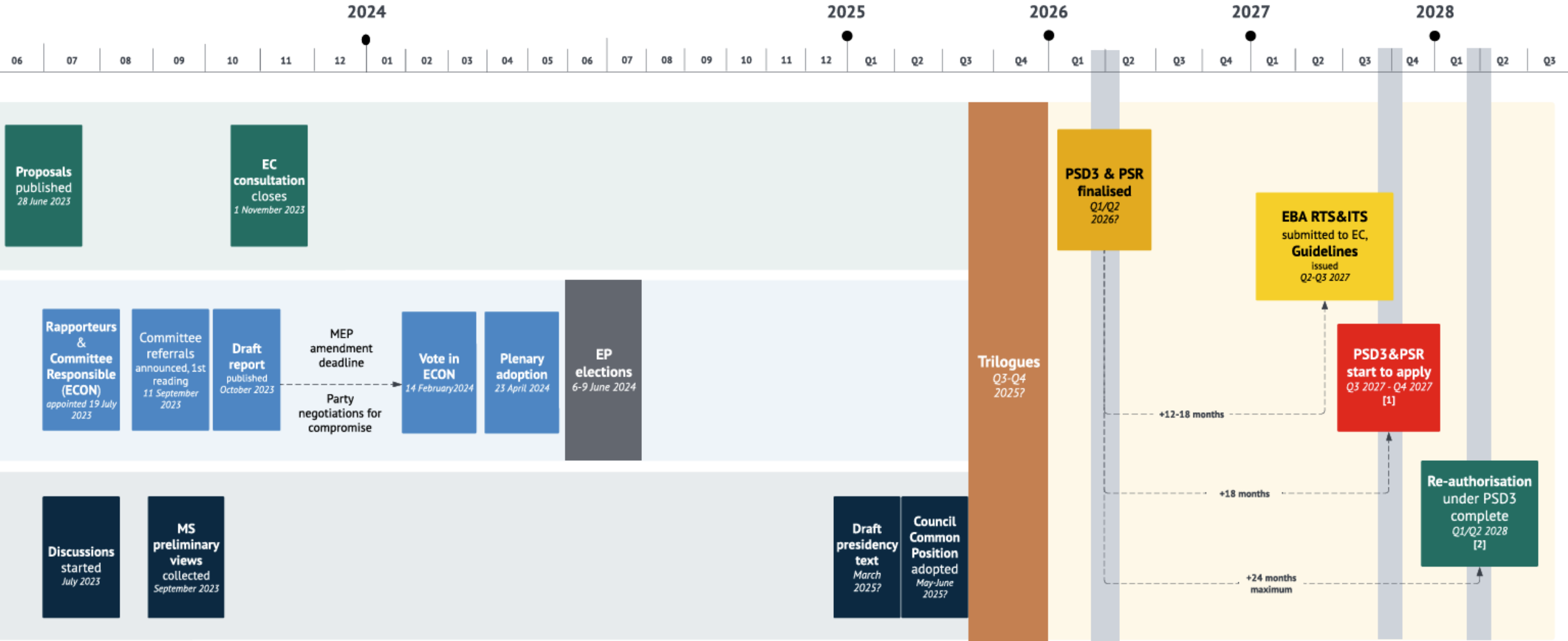
- Reporting requirements (incl. Art. 39) previously identified by the Council as a politically sensitive issue, with potential for a technical solution. - *Is this item still open for discussion?*

## Next steps

- Formal adoption by the co-legislators expected in early 2026 (Q1)
- 12-18 months after publication of the text to Official journal:
  - EBA to take into account experience acquired in the application of [Regulatory Technical Standards](#) (RTS) on LNE
  - Public consultation to be launched prior to adoption of any new guidelines.

# 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 the Last Meeting

- Broad dissemination of the FCE/UPEI position paper to MEPs and Permanent Representations.
- Discussion with DG FISMA (FCE delegation) and MEP Kubín (Eurowag) on simplifying the LNE notification process.
- Outreach to several Permanent Representations to obtain agreed text versions.

## Upcoming

- Clarify whether Article 39 remains open for discussion.
- Plan the FCE action points to effectively influence the upcoming revision of the existing RTS.



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

## Meeting with DG FISMA - 20 November

- No contextual information on the case was shared.
- DG FISMA confirmed that the question relates strictly to PSD2, should be interpreted narrowly, and applies only to cases with similar patterns.
- NCAs reviewed the question before its publication.
- DG FISMA suggested submitting a new Q&A to the EBA to clarify the treatment of typical fleet cards under PSD2.

## Q&A document on technical issues is currently being drafted

## Updated FCE position

- The Commission's reply does not apply to the business models of FCE members.



# Q&A on fuel card classification under PSD2

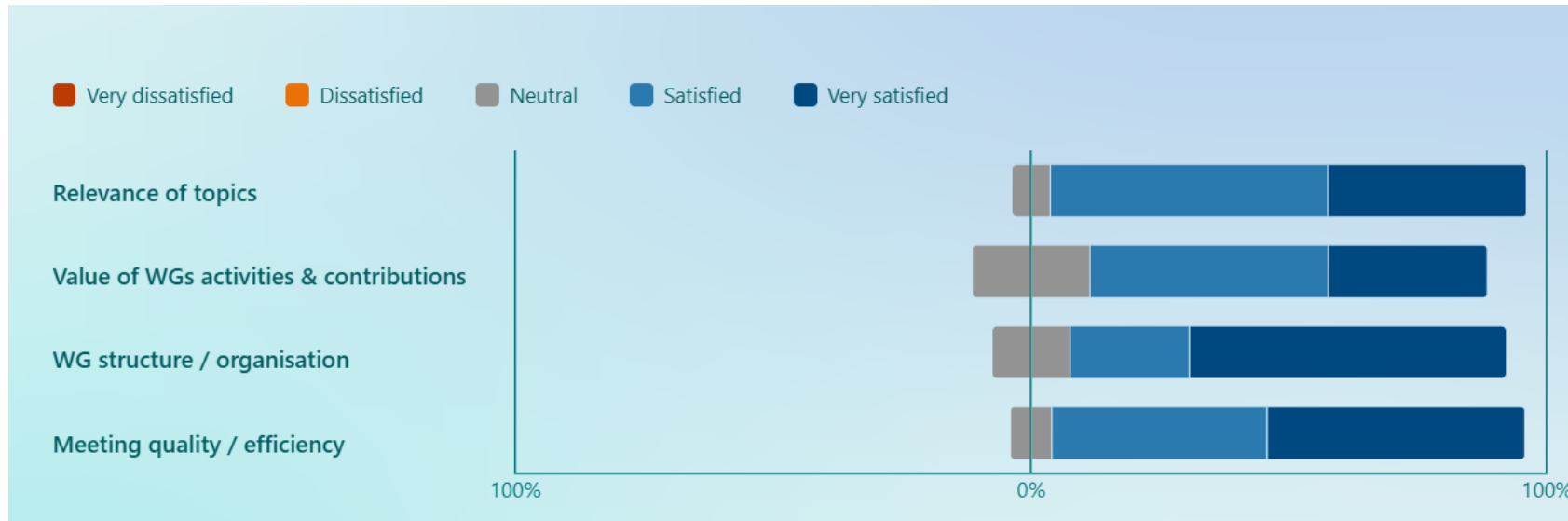
1. What is the typical business model for a fuel card?
2. Under PSD2, does a fuel card qualify as a payment instrument as defined in art. 4(14)?
3. Are fuel cards considered personalised devices or a set of procedures under PSD2?
4. Does a fuel card initiate a payment order?
5. Does the operation of 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?

# 5. Payment Working Group 2026 Roadmap



## Annual satisfaction survey result : performance & priorities

13 responses submitted



### Future agenda priorities (qualitative feedback)

- Secure **more direct meetings with policymakers** (e.g., Perm Reps, MEPs) to enhance FCE's advocacy profile.
- Establish **bridges with the EV charging**.
- **Member Engagement:** Actively work to **increase participation from all members** to ensure the WG's vision is inclusive and broadly supported.

# 5. Payment Working Group 2026 Roadmap (discussion kick-off)



## What's already planned:

- Early 2026: launch of the **new intranet workspace**
- Central hub where all documentation, meeting materials, and WG resources will be accessible.
- Yearly **in-person meeting in Brussels** with external guests

## Objective of today's discussion

1. **Identify the topics** you want included in the 2026 Roadmap
2. **Clarify the type of actions** we should apply to each topic
3. Discuss how **the merger of Tax and Payment working groups** should be operationalised

# 4. Payment Working Group 2026 Roadmap (discussion kick-off)



## Suggested topics for 2026

- PSR/PSD3 implementation (notification process)
- PSR/PSD 3 – RTS adoption/revision
- EV charging activities

## Types of actions we can apply

- **Stage 1 - Monitoring**  
Low involvement  
Regular tracking of legislative, regulatory, and policy developments.
- **Stage 2 – Knowledge-building**  
Medium involvement  
Internal exchange of information among members  
Targeted capacity-building activities (with the support of external experts when relevant)
- **Stage 3 – Influence/Advocacy**  
High involvement  
Coordinated actions with clear, pre-agreed objective  
Position papers, outreach, and structured engagement with policymakers

Topics may move between stages during the year as needed

**Which topics should we prioritise for 2026, and what type of action should we target for each?**



# AOB / open discussion

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

## **UNITI Mobility Payment Forum**

14-15 January 2026 – Hamburg

(Further details: [UMPF-Forum - UNITI Mobility Payment Forum](#))



# AOB / open discussion

## Payment working group calendar :

**January 22<sup>nd</sup> at 10 am CET**

March 12<sup>th</sup> at 10 am CET

April 23<sup>rd</sup> at 10 am CEST

June 4<sup>th</sup> at 10 am CEST

July 16<sup>th</sup> at 10 am CEST