

Payment Working Group – January 2026

Agenda

- Competition law compliance reminder
- Status of PSR / PSD3 adoption
- Update on PSR / PSD3 PA Action Plan
- EBA guidelines on the Limited Network Exclusion (2022)
- Payment Working Group - 2026 Roadmap
- Opening of candidacy for new Chair
- 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 – should be finalised in February

Outstanding issue

- **Reporting requirements (incl. Art. 39)** previously identified by the Council as a politically sensitive issue, with potential for a technical solution. –

Latest Presidency proposal →

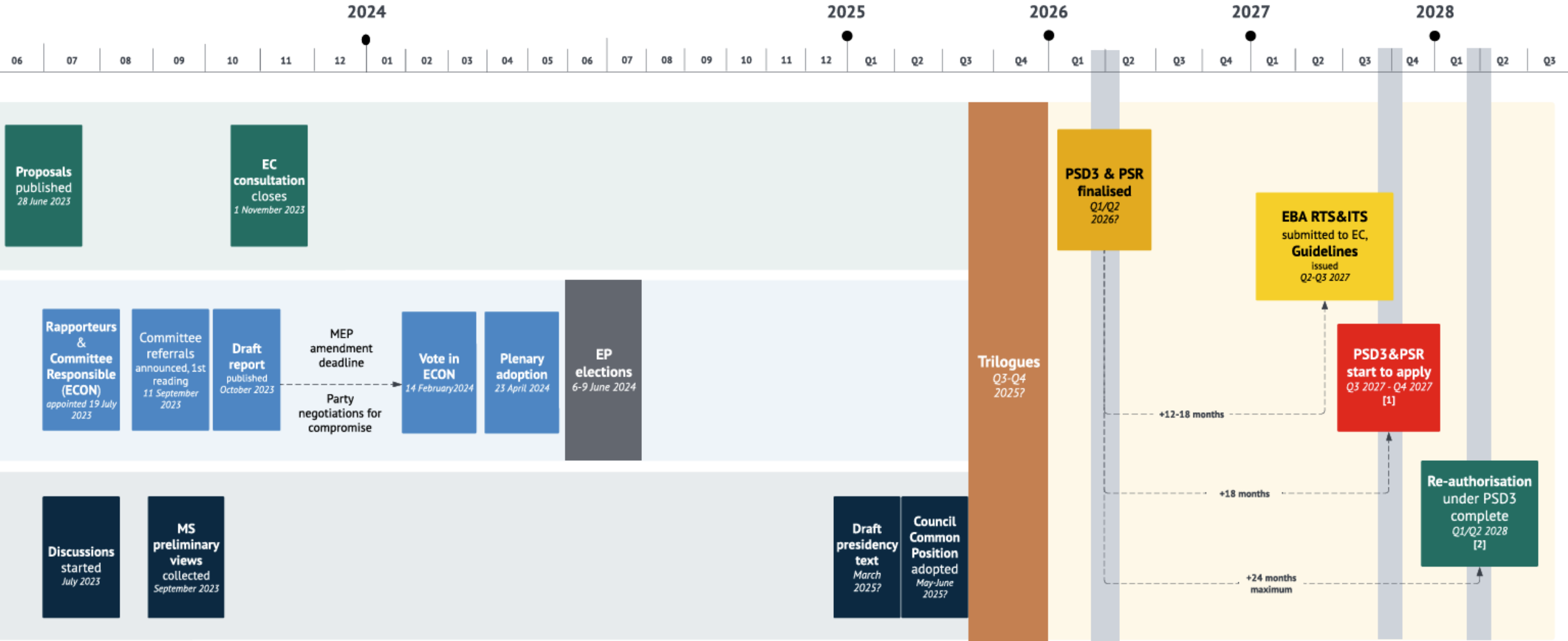
- The LNE notification requirement (PSD3 Art 39, first subparagraph) - when the EUR 1 million threshold is reached - could be made **optional** (at the discretion of a Member State): Member States **may** require the providers of LNE services for which the total value of payment transactions executed over the preceding 12 months exceeds EUR 1 million to notify the NCAs.
- HOWEVER, the second subparagraph introduced suggests a **new and additional ground** for the NCAs to require notification of LNE services - regardless of whether the EUR 1 million threshold is reached...

*Member States shall ensure that competent authorities are entitled to require **any** service providers that carry out either of the [LNE] activities ... to inform those [NCAs] about the services offered...*

*Where [NCA] has received information pursuant to subparagraph 1 **or 2**, and where the activity does not qualify as a **limited network**, the competent authority shall take a duly motivated decision ...*

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 Autumn 2025

- 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.

4. EBA Guidelines on the LNE



Regulatory context

- The EBA will assess experience gained since 2022 in applying RTS on LNE
- Based on this assessment, the EBA will decide whether new guidelines are necessary
- Any new guidelines must be preceded by a public consultation.

FCE's advocacy:

- Begin identifying practical improvements and optimisation opportunities
- Contribute proactively to any future regulatory discussion

For discussion today:

- Short paper prepared by Radius
 - Key observations from implementation of the 2022 LNE Guidelines
 - Suggested areas for clarification and improvement

What are your thoughts? Where should we prioritise our input?

5. Payment Working Group - 2026 Roadmap



2026 work stream & priorities proposal

- The Tax WG will remain separate (no merger with the Payment Working Group)

Monitoring	Knowledge-building	Influence	In-person meeting with external guests
		PSR/PSD3 implementation (notification process)	Proposal:
		PSR/PSD3 – RTS revision	Meeting with the EBA in Paris to discuss the revision of the EBA guidelines on the LNE
		Home-charging reimbursement exclusion from financial services or payment activity*	

**All EV-related topics will be refined through a dedicated online meeting with EV experts before being integrated into existing WGs.*

6. Opening for candidacy for new Chair



Key Decision: Chair Rotation System

To strengthen member engagement and ensure principles of good governance, the Board has unanimously approved a formal rotation system for all Working Group Chairs.

- **Term limits:** Chairs are now appointed for a two-year term.
- **Renewal:** at the end of the term, Chairs may be either reconducted for another term or replaced.
- **Eligibility:** in accordance with the by-laws, only Full Members are eligible for appointment to Chair positions.

Next Steps

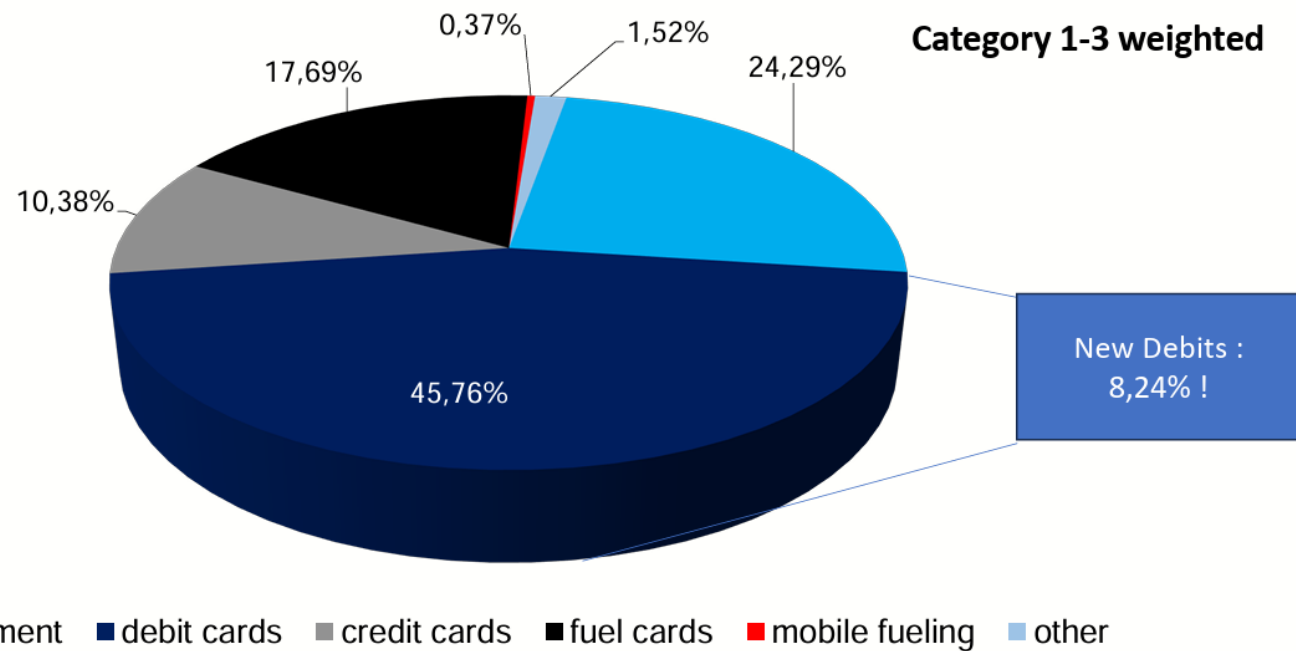
- The Secretariat will circulate the call for candidacy by email.
- Working Group members to make a decision at the March meeting.
- The Board to endorse the decision in Q2 2026.

7. AOB / open discussion



Takeaways from UNITI Mobility Payment Forum

Share of payment methods in total sales at petrol stations 2025

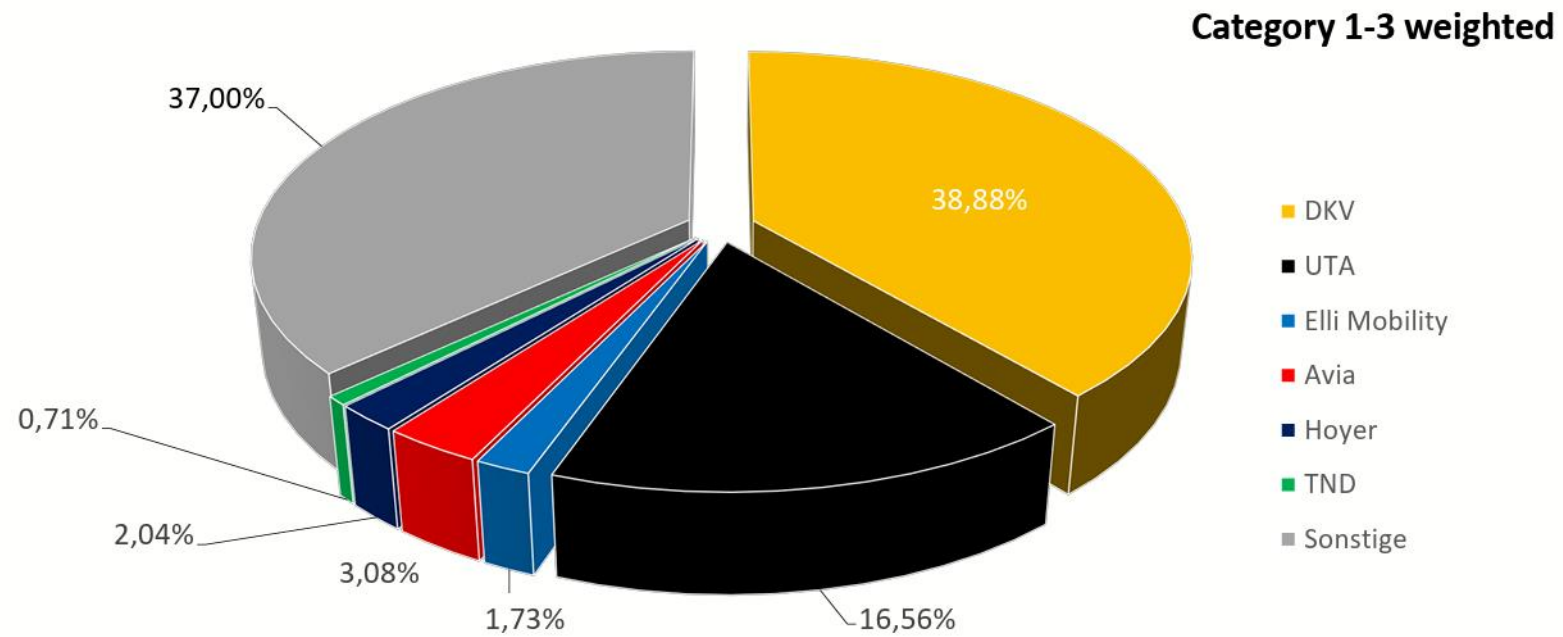


7. AOB / open discussion

Takeaways from UNITI Mobility Payment Forum

Industry sales channel fuel cards - revenue shares 2025*

stolte
consult



7. AOB / open discussion



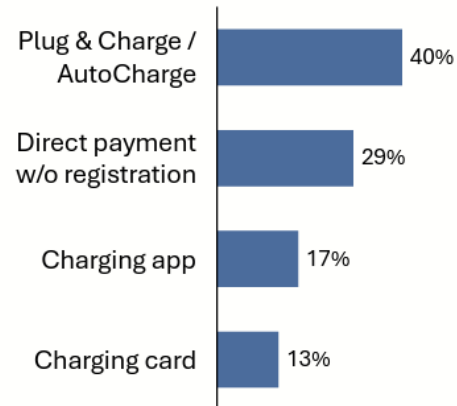
Takeaways from UNITI Mobility Payment Forum

EV-Charging

The paradoxon of preferred and effective usage of payment methods



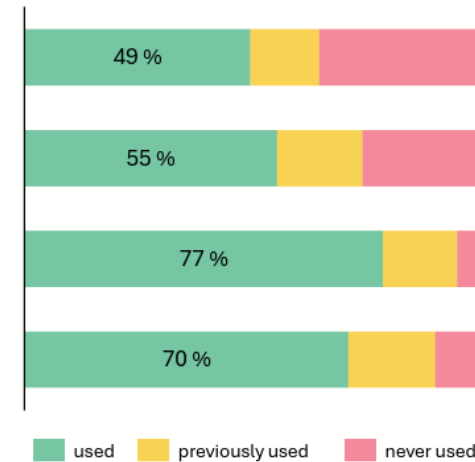
Payment methods preferred:



N = 1,510

"If one day all charging stations offered your preferred payment method and it always worked perfectly, which one would it be?"

Payment methods actually used:



used previously used never used

"Which payment methods do you use or have you used?"

Payment working group calendar :

March 12th at 10 am CET

April 23rd at 10 am CEST

June 4th at 10 am CEST

July 16th at 10 am CEST