

Payment Working Group March 2026

Agenda

- Competition law compliance reminder
- Status of PSR / PSD3 adoption
- Update on PSR / PSD3 PA Action Plan
- Monitoring table on LNE notification update
- FCE Business factsheet
- AOB



1. 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.

2. Status of PSR/PSD3 adoption



Political agreement – Status update

- **27 November** : political agreement reached.
- **5 March** : interinstitutional technical work concluded.
- Until 11 March: fatal-flaws check by Member States.
- **Next steps**: formal legal and linguistic review, followed by adoption by the European Parliament (plenary vote) and the Council.

Entry into force and application

- Legislation **to apply 21 months after entry into force** (following publication in the Official Journal) – expected early 2028 (tbc).
- Between publication and application, certain technical elements will be specified through Delegated Acts.

Review clauses

- 3 years after entry into force: report on the scope of PSD3.
- 7 years after entry into force: report on the application and impact of PSD3 and PSR.

2. Status of PSR/PSD3 adoption



PSR – Article 2 “Scope”

Commission’s proposal

2. This Regulation does not apply to the following services:

{...}

(j) services based on specific payment instruments that meet one of the following conditions:

{...}

(ii) instruments which can be used only to acquire a very limited range of goods or services;

Draft Agreement (5 March 2026)

2. This Regulation does not apply to the following services:

{...}

(j) services based on specific payment instruments, including electronic money-based instruments, that meet one of the following conditions:

{...}

(ii) instruments which can be used only to acquire a very limited range of goods or services, including instruments restricted to be used in transactions between payment service users who are not consumers;

2. Status of PSR/PSD3 adoption



PSR – Article 2 “Scope”

Commission’s proposal

8. The EBA shall develop draft Regulatory Technical Standards to specify the conditions of the exclusions referred to in paragraph 2, point (j). The EBA shall take into account the experience acquired in the application of the EBA guidelines of 24 February 2022 on the limited network exclusion under Directive (EU) 2015/2366.

The EBA shall submit the Regulatory Technical Standards referred to in the first subparagraph to the Commission by *[OP please insert the date= one year after the date of entry into force of this Regulation]*. Power is delegated on the Commission to adopt the Regulatory Technical Standards referred to in the first subparagraph in accordance with Articles 10 to 14 of Regulation (EU) No 1093/2010.

Draft Agreement (5 March 2026)

8. The EBA shall develop draft Regulatory Technical Standards to specify the conditions of the exclusions referred to in paragraph 2, point (j). The EBA shall take into account the experience acquired in the application of the EBA guidelines of 24 February 2022 on the limited network exclusion under Directive (EU) 2015/2366.

The EBA shall submit the Regulatory Technical Standards referred to in the first subparagraph to the Commission by *[OP please insert the date= one year after the date of entry into force of this Regulation – Approx. April 2027]*. Power is delegated on the Commission to adopt the Regulatory Technical Standards referred to in the first subparagraph in accordance with Articles 10 to 14 of Regulation (EU) No 1093/2010.

2. Status of PSR/PSD3 adoption



PSD3 – Article 39 “Duty of notification”

Commission’s proposal

1. Member States shall require service providers that carry out either of the activities referred to in Article 2(1), points (j), (i) and (ii), of Regulation XXX [PSR] or carrying out both activities, for which the total value of payment transactions executed over the preceding 12 months exceeds EUR 1 million, to inform the competent authorities about the services offered, specifying under which exclusion as referred to Article 2(1), points (j), (i) and (ii), of Regulation XXX [PSR] the activity is considered to be carried out.

Draft Agreement (5 March 2026)

1. Member States ~~shall~~ may require service providers that carry out either of the activities referred to in Article ~~2(1)~~ 2(2), points (j), (i) and (ii), of Regulation XXX [PSR] or ~~carrying~~ carry out both activities, for which the total value of payment transactions executed over the preceding 12 months exceeds EUR 1 million, to inform the competent authorities about the services offered, specifying under which exclusion as referred to Article ~~2(1)~~ 2(2), points (j), (i) and (ii), of Regulation XXX [PSR] the activity is considered to be carried out.

→ LNE notification depends on each NCAs decision to make it mandatory or not.

2. Status of PSR/PSD3 adoption



PSD3 – Article 39 “Duty of notification”

Commission’s proposal

1. (a) NEW

Draft Agreement (5 March 2026)

1. (a) Member States shall ensure that competent authorities are entitled to require any service providers that carry out either of the activities referred to in Article 2(2), points (j), (i) and (ii), of Regulation XXX [PSR], or carry out both activities, to inform those authorities about the services offered, specifying under which exclusion as referred to Article 2(2), points (j), (i) and (ii), of Regulation XXX [PSR] the activity is considered to be carried out.

→ National legislators must empower NCAs to act independently and require notification where necessary.

2. Status of PSR/PSD3 adoption



PSD3 – Article 39 “Duty of notification”

Commission’s proposal

On the basis of that notification, the competent authority shall take a duly motivated decision on the basis of criteria referred to in Article 2(1), point (j), of Regulation XXX [PSR] where the activity does not qualify as a limited network, and inform the service provider thereof.

Draft Agreement (5 March 2026)

~~On the basis of that notification~~ Where a competent authority 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 on the basis of criteria referred to in Article ~~2(1)~~ 2(2), point (j), (i) and (ii), of Regulation XXX [PSR] ~~where the activity does not qualify as a limited network~~, and inform the service provider thereof.

3. PSR/PSD 3 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 and clarify status of Article 39 (Q1 2026).

Upcoming

- Monitor formal adoption of the texts.
- Plan the FCE action points to effectively influence the upcoming revision of the existing RTS.

4. Monitoring table on LNE notification update



Member State	DKV	E100	Edenred	Eurowag	Corpay	OnTurtle	MOL	MultiTankCard	Radius	RMC Services	Tankpool24	TFC	WEX
	updated 28/02/2026		updated 19/02/2026		updated 30/04/2025								updated 15/05/2025
AT	Austria		Edenred fuel card is NOT payment instrument.	EUROWAG Fuel card IS NOT payment instrument.	Fleetcor fuel card is payment instrument registered under LNE.								In progress for foreign issuer only since November 23
BE	Belgium	DKV fuel cards are payment instruments registered under LNE	Edenred fuel card is NOT payment instrument.	EUROWAG Fuel card IS NOT payment instrument.					Radius Fuel cards are not payment instruments, they are 'Registration Instruments'				WEX fuel card is NOT payment instrument.
BG	Bulgaria		In Progress since Aug 2022										
HR	Croatia		In Progress since Aug 2022										
CY	Cyprus												
CZ	Czech Republic		In Progress since Aug 2022	EUROWAG Fuel card is payment instrument registered under LNE.	Fleetcor fuel card is payment instrument registered under LNE.								
DK	Denmark		Edenred fuel card is NOT payment instrument.	EUROWAG Fuel card is payment instrument registered under LNE.									
EE	Estonia		In Progress since Aug 2022										
FI	Finland	DKV fuel card IS NOT payment instrument.	In Progress since Aug 2022										
FR	France	In progress since 2024	In Progress since Aug 2022						Radius fuel cards are payment instruments registered under LNE.				WEX fuel cards are payment instruments registered under the LNE
DE	Germany		Edenred fuel card is NOT payment instrument.		Fleetcor fuel card is payment instrument registered under LNE.				Radius fuel cards are payment instruments registered under LNE.				In Progress since September 2022
EL	Greece	DKV fuel card IS NOT payment instrument.											
HU	Hungary		Edenred fuel card is NOT payment instrument.	EUROWAG Fuel card is payment instrument registered under LNE.	Fleetcor fuel card IS NOT payment instrument.								
IE	Ireland	DKV fuel cards are payment instruments registered under LNE							Radius fuel cards are payment instruments registered under LNE.				
IT	Italy	DKV fuel cards are payment instruments registered under LNE. DKV fuel cards are payment instruments registered under LNE.	In Progress since Aug 2022						Radius fuel cards are payment instruments registered under LNE.				In Progress since September 2022
LV	Latvia	DKV fuel cards are payment instruments registered under LNE.	In Progress since Aug 2022										
LT	Lithuania	DKV fuel cards are payment instruments registered under LNE	Edenred fuel cards are payment instruments registered under LNE	EUROWAG Fuel card is payment instrument registered under LNE.									
LU	Luxembourg	DKV fuel card IS NOT payment instrument.	Edenred fuel card is NOT payment instrument.	EUROWAG Fuel card IS NOT payment instrument.									WEX fuel card IS NOT payment instrument.
MT	Malta												
NL	Netherlands		In Progress since Aug 2022		In progress				In Progress				WEX fuel card is payment instrument registered under LNE
PL	Poland	DKV fuel card IS NOT payment instrument.	Edenred fuel card is NOT payment instrument.	EUROWAG Fuel card IS NOT payment instrument.	Fleetcor fuel card IS NOT payment instrument.								
PT	Portugal	DKV fuel cards are payment instruments registered under LNE	Edenred fuel cards are payment instruments registered under LNE.							In Progress			
RO	Romania		Edenred fuel card is NOT payment instrument.	EUROWAG Fuel card IS NOT payment instrument.									
SK	Slovakia		Edenred fuel cards are payment instruments registered under LNE.	EUROWAG Fuel card is payment instrument registered under LNE.	Fleetcor fuel card IS NOT payment instrument. (from 2026)								
SI	Slovenia	DKV fuel card IS NOT payment instrument.	Edenred fuel card is NOT payment instrument.	EUROWAG Fuel card IS NOT payment instrument.									
ES	Spain	DKV fuel cards are payment instruments registered under LNE.	Edenred fuel cards are payment instruments registered under LNE.			OnTurtle fuel card IS NOT a payment instrument. (December 2024)			Radius fuel cards are payment instruments registered under LNE.				
SE	Sweden	DKV fuel card IS NOT payment instrument.	Edenred fuel card is NOT payment instrument.	EUROWAG Fuel card IS NOT payment instrument.									

- Fuel card is not a payment instrument
- fuel card is a payment instrument registered under the LNE
- in progress since [date]

5. FCE Business Factsheet



- **Release:** first-ever Fleet Cards Companies business factsheet published on 5 March.
- **Objective:** raise awareness and understanding of fleet cards among key decision makers and key EU mobility and energy stakeholders, ensuring FCE is recognised and considered in policy discussions.
- **Dissemination:** FCE's website, bilateral meetings and LinkedIn campaign.

Feedback:

- Open to suggestions to improve the content.
- Are there any relevant figures or data that should be added ?
- **Call to action:** please share within your network to maximise impact and visibility.

Payment working group calendar :

April 16th at 3 pm CEST – New date !

June 4th at 10 am CEST

July 16th at 10 am CEST