



ETPPA welcomes EBA's recognition of obstacles

Brussels, June 8 2020, The European Third Party Payment Providers Association (ETPPA) would like to welcome the European Banking Authority's new "Opinion on obstacles to the provision of third party provider services under the Payment Services Directive" dated June 4, 2020.

This long awaited Opinion positively confirms a number of key areas that the ETPPA has been advocating for on behalf of its members, which are in the clear interest of consumers and merchants across Europe who use these services every day. In that regard the ETPPA would like to highlight the following points:

We welcome the EBA's clarification that no more than one SCA is required for both AIS- and PIS-only payment journeys.

We support the EBA's statement that a valid eIDAS is sufficient to access ASPSP accounts and that under normal circumstances a TPP registration process is not required.

In relation to the topic of consent, it is important to note that ASPSP must not introduce checks on consent in addition to what the TPP has already done, given that this is the legal obligation on the latter.

However, we are concerned and disappointed about the fact that the 90-day re-authentication requirement cannot be executed by TPPs directly and instead still remains in the control of ASPSPs, despite the EBA's advice to NCAs to encourage ASPSPs to at least use the exemption that avoids to do this daily.

Whilst the ETPPA welcomes that in the context of account selection a mandatory manual IBAN entry is considered an obstacle, the fact that ASPSPs are not required to provide a list



of payment accounts to PISPs will remain challenging for those that are not holding an AIS licence as well. This will mean an increased regulatory and technical burden on many providers who do not provide AIS services. Additionally, there will now be more friction in the consumer experience in this context compared to existing AIS and PIS journeys, which we believe is not a desirable objective or outcome.

Nevertheless, the ETPPA would like to underline the importance of this Opinion as a crucial step towards a more competitive European payments market. It is now of utmost importance to ensure that API standards and their implementations are delivered in line with these important clarifications. We look forward to continuing our support of the implementation of PSD2 APIs in a way that supports payment innovation in Europe.

About ETPPA:

ETPPA is the European trade association of non-bank third party providers. It was established as a non-profit organisation in April 2019 and formalised the pre-existing Future of European Fintech (FoEF) coalition founded in 2017 to represent the interests of bank-independent third party providers. Its founding members are BridgeAPI/Bankin', Eurobits, PPRO, Klarna/Sofort and Trustly.

Website: www.etppa.org

Linkedin: www.linkedin.com/company/etppa

Contact: press@etppa.org