

# Public consultation on instant payments

Fields marked with \* are mandatory.

## Introduction

---

This consultation is now available in 23 European Union official languages.

Please use the language selector at the top of this page to choose your language for this consultation.

The present consultation will inform the Commission on remaining obstacles as well as possible enabling actions that it could take to ensure a wide availability and use of instant payments in the EU. It will also enable the Commission to decide on whether EU coordinated action and/or policy measures are warranted in order to ensure that a critical mass of EU payment service providers (PSPs) offer instant credit transfers. The consultation also seeks to identify factors that would be relevant for fostering customer demand (from consumers, corporate users and merchants alike) towards instant credit transfers.

EU citizens and companies expect to have at their disposal convenient, secure and cost-efficient payment solutions to make their payments, both domestically and cross-border. Instant payments technology can be a powerful enabler for the emergence of payment solutions meeting these expectations. Most credit transfers today reach the beneficiary on the following business day and some even take longer. In contrast, instant credit transfers allow funds to be available on the account of the beneficiary within seconds, 24 hours a day, every day of the year, including weekends and public holidays. This entails potential advantages for consumer and corporate users alike.

For an instant credit transfer to be successfully completed, at each end of the transfer there needs to be a PSP adhering to the same set of rules, practices and standards for the execution of that transfer (a single 'scheme'). For euro instant credit transfers within the [Single Euro Payments Area \(SEPA\)](#) such a scheme was developed in 2017 by the [European Payments Council](#) (the 'SCT Inst. Scheme'). A broad level of participation by PSPs in the scheme is a key precondition for the wide availability of euro instant transfers at EU level. As of March 2021, only 64.6% of PSPs located in 21 Member States have joined the SCT Inst. Scheme. Similar schemes also exist in some non euro area Member States for instant credit transfers in their local currency.

Instant credit transfers can be conveniently used in a variety of situations such as purchases in physical shops and online (so called 'point of interaction' with merchants), or person-to-person payments, such as splitting a restaurant bill. This requires the instant credit transfer to be combined with a 'front-end' solution, such as one based on mobile phone applications, e-invoices, standardised messages requesting payments, etc.

The consultation aims at identifying the concerns that would need to be addressed to incentivise EU payments market players to offer innovative, convenient, safe and cost-efficient pan-European payment solutions based on instant credit

transfers. At the same time, it would help establish what features and safeguards would enable the users to reap the benefits of instant payments to the fullest.

This public consultation is addressed to a broad range of stakeholders: payment services users (consumers, corporate users and merchants), PSPs and providers of supporting technical services, clearing and settlement mechanisms, relevant public authorities, national regulators and others - all playing an important role in ensuring a smooth transition towards well-functioning and efficient pan-European instant payment solutions.

This consultation follows from the [Commission Communication from December 2018 “Towards a stronger international role of the euro”](#), which supported a fully integrated instant payment framework in the EU in order to reduce the risks and the vulnerabilities in retail payment systems and to increase the autonomy of existing payment solutions, and the [Commission Communication on a “retail payments strategy in the EU” adopted on 24 September 2020](#), which confirmed the goal of fostering the full take up of instant payments in the EU and listed a number of possible initiatives to support that objective.

The results of this consultation will be used to promote, as part of the Commission’s vision for the EU’s retail payments market, the availability of competitive home-grown and pan-European payment solutions, supporting Europe’s open strategic autonomy in the macro-economic and financial fields, the importance of which was reiterated in the recent [Commission Communication of January 2021 “The European economic and financial system: fostering openness, strength and resilience”](#).

**If you are a provider of payment services (PSP) or supporting technical services, please note that in addition to this public consultation you are invited to respond to the [targeted consultation](#) which contains questions of a more technical nature.**

---

**Please note:** In order to ensure a fair and transparent consultation process **only responses received through our online questionnaire will be taken into account** and included in the report summarising the responses. Should you have a problem completing this questionnaire or if you require particular assistance, please contact [fisma-instant-payments@ec.europa.eu](mailto:fisma-instant-payments@ec.europa.eu).

More information on

- [this consultation](#)
- [the consultation document](#)
- [the consultation strategy](#)
- [payment services](#)
- [the protection of personal data regime for this consultation](#)

## About you

---

\* Language of my contribution

- Bulgarian
- Croatian
- Czech

- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

\* First name

EDPIA

\* Surname

secretariat

\* Email (this won't be published)

secretariat@edpia.eu

\* Organisation name

*255 character(s) maximum*

The European Digital Payments Industry Alliance (EDPIA)

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

\* Please specify if your company is a small and medium sized enterprise (SME) according to the [definition provided by EU recommendation 2003/361](#)

- Yes, it is an SME
- No, it is not an SME
- Don't know / no opinion / not applicable

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

704370938610-77

\* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Åland Islands
- Djibouti
- Dominica
- Libya
- Liechtenstein
- Saint Martin
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname

- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

## \* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

## User perspective

---

Note: For the purpose of the questionnaire, instant credit transfers mean either SCT Inst. (euro instant credit transfers), or instant credit transfers in another EU currency.

**Question 1. To your knowledge, does your payment service provider (e.g., your bank) provide you with the possibility to make instant credit transfers?**

- Yes
- No
- I don't know
- Not applicable

## Consumer preferences

**Consumer preferences for instant credit transfers (for example in the context of using online banking)**

**Question 2. Please rate the importance of the reasons/conditions listed below, which would incentivise you as consumer to opt for an instant credit transfer:**

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
Need for the funds to be credited to the beneficiary within seconds	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Need for the funds to be credited to the beneficiary within seconds also outside business hours (24 hours a day, any day of the year)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost (compared with a regular credit transfer)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Existence of safeguards regarding the risk of fraud or error (e.g. the possibility to receive an immediate confirmation as to whether the IBAN number of the beneficiary account matches the name featuring on the beneficiary account)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Please explain your answers to question 2:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Question 3. In order to be able to send the funds 24 hours a day, any day of the year (including weekends and public holidays) and be certain that the beneficiary receives the funds within seconds, would you, as consumer, be willing to pay a premium fee for instant credit transfers compared to regular credit transfers?**

- Yes
- No
- Don't know / no opinion / not applicable

**Please explain your answer(s) to question 3:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Question 4. As consumer, if you opt for an instant credit transfer, do you consider that, in order to prevent the risk of fraud or error, your bank should offer a service allowing, prior to the initiation of the transfer, for the immediate verification of the 'match' between the IBAN of the beneficiary and the name on the beneficiary account?**

- Yes, automatically and free of charge for the consumer
- Yes, automatically and I accept that there could be a fee to pay for that service
- Yes, but as an optional service with a fee
- No, I don't believe this is necessary
- I don't know / no opinion
- Not applicable

**Consumer preferences for instant credit transfers at point of interaction (e.g. when paying in a shop, making on-line purchases, etc.)**

**Question 5. Please rate the importance of the factors below which would incentivise you as consumer to opt for an instant credit transfer when paying in a shop or online (at ‘point of interaction’):**

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
Speed (funds are credited to the beneficiary within seconds, 24 hours a day, any day of the year, e.g. to ensure quicker delivery of goods/services in e-commerce)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility to ask for a refund (in cases of non-delivery of the goods, damaged or non-conform goods etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility to pay in a broad range of places and situations (shops, restaurants, gas stations, public administrations, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility to pay not only in your own country but also anywhere in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Global acceptance (possibility to pay worldwide)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Convenience (e.g., if used via a mobile payment app/digital wallet no need to carry cash or a card)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Possibility to integrate in a mobile payment app /digital wallet loyalty points or additional features	<input type="radio"/>						
Presence of a visible label or recognisable brand similar to card brands	<input type="radio"/>						
Other	<input type="radio"/>						

**Please explain your answers to question 5:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Merchant preferences**

---

**Question 6. As merchant, please rate the importance of each of the factors below when deciding on whether to offer customers the possibility to pay with instant credit transfers at ‘point of interaction’:**

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
Cost (e.g. lower merchant fees than for cards)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Speed: Instantaneous availability of funds 24 hours a day, any day of the year	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ability to accept payments from customers from other Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Seamlessness at check-out (minimum number of steps to complete the transaction)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of a merchant account reconciliation service (i.e. the process of matching a payment recorded in the bank account of the merchant with the sales of the merchant)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of an omni-channel point of sale (POS) solution offering payers means of selecting their preferred means of payment (e.g. card, credit transfer, instant credit transfer, direct debit, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ability to set up a default selection of payment applications, including instant credit transfer option	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Availability of services allowing the incorporation of loyalty points of the merchant in the payment method	<input type="radio"/>						
Possibility to accept payments without (or with very little) acceptance hardware required (e.g. acceptance integrated in the check outs or using a tablet so no need for a dedicated payment terminal)	<input type="radio"/>						
Other	<input type="radio"/>						

**Please explain your answers to question 6:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Corporate user preferences**

---

**Question 7. As corporate user, what benefits do you see in using instant credit transfers? Please rate the importance of the type of benefits listed below:**

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
Being able to manage cash flows more efficiently	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Timely payment of invoices or any other payment obligations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Being able to offer services to clients more efficiently (e.g. provide instant refunds)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Please explain your answers to question 7:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Question 8. Would an immediate availability of funds enable you to fulfil your obligations (e.g. instant shipment of the order) sooner, compared to the situation when the funds are not immediately available?**

- Yes
- No
- Don't know / no opinion / not applicable

**Please explain your answers to question 8:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Question 9. Please explain the potential impact on your internal operations arising from adapting them to instant credit transfers:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Question 10. In your view, is the fact that euro instant credit transfers under the SCT Inst. Scheme are currently capped at EUR 100,000 an obstacle to their use by corporates?**

- Yes
- No

- No opinion
- Not applicable

**Please explain your answer(s) to question 10:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Question 11. Would the availability of batch processing of instant credit transfers (for multiple payment transactions bundled together), as opposed to the processing per each individual transaction, make the use of instant credit transfers more attractive to corporate users?**

- Yes
- No
- No opinion
- Not applicable

**Please explain your answer to question 11:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Question 12. Are there any other obstacles to the use of instant credit transfers by corporates, both domestically and cross-border?**

- Yes
- No
- No opinion
- Not applicable

**Question 13. What type of value added services would make instant credit transfers more useful from your perspective (e.g. Request to Pay, e-invoicing)? Please explain:**

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

**Question 14. In order to be able to send the funds 24 hours a day, any day of the year (including weekends and public holidays) and be certain that the beneficiary receives the funds within seconds, would you, as a corporate user, be willing to pay a premium fee for instant credit transfers compared to regular credit transfers?**

- Yes
- No
- No opinion
- Not applicable

**Please explain your answer(s) to question 14:**

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

## Payment Service Provider (PSP) perspective

---

**Question 15. If you are a PSP providing and maintaining payment accounts for payers, have you adhered to an instant credit transfer scheme:**

	Yes	No	I don't know	Not applicable
To the SCT Inst. Scheme	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
To another scheme (for instant credit transfers in an EU currency other than euro)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**Question 16. What benefits do you see, as PSP, in offering instant credit transfers? Please rate the importance of the benefits listed below:**

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
New source of revenue	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Attract a larger customer base	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preserve the existing customer base	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Save costs in other areas of operations (e.g. cash management and distribution, ATM maintenance, security costs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ability to (cross) sell other services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide an alternative to other widely used means of payment such as cards and therefore generate cost savings and become more independent from other providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Please explain your answers to question 16:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The EDPIA believes that all the benefits listed above are of equal importance. It is important that instant payments should be attractive for end-users, where pricing is carefully analysed and multiple options are offered to the customer base. In addition, in certain EU Member States cards are less used as a means of payment, therefore offering an alternative could enhance financial inclusion as well as interoperability. It is also paramount to have a competitive European payments landscape with home-grown players, accompanied with a non-discriminatory view on payments options at the Point of Interaction.

In addition, we would like to add further explanation to our choice of 'not applicable' in Question 15, as there was no explanation box for those options:

The EDPIA is an association with a membership of various actors including PSPs and non-PSPs and can therefore not provide a concrete answer to the above question.

In addition, EDPIA's members are primarily active on the merchant's side of payments and can therefore not provide a EDPIA position on maintaining payment accounts for payers.

**Question 17. In your opinion, could instant credit transfers aggravate bank runs and thus contribute to bank failures?**

- Yes
- No
- Don't know / no opinion / not applicable

**Question 17.1 Which of the following mechanisms or tools would you consider as useful in addressing this type of intense liquidity outflows?**

	Yes	No	No opinion	Not applicable
A daily limit as regards the amount which could be transferred via instant credit transfers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
A discretionary power allowing competent authorities to suspend instant payment obligations of the financial institution concerned for a certain period of time	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other mechanisms that may be available to either PSPs or competent authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
--	----------------------------------	-----------------------	-----------------------	-----------------------

**Please specify to what other mechanism(s) you refer in your answer to question 17.1:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The EDPIA believes it is better to adopt a more flexible mechanism, based on PSPs size and abilities to handle liquidity outflows. In case this mechanism is being adopted, it is important to implement an ongoing dynamic assessment to detect the time when liquidity positions are presenting a risk.

**Please explain your answer(s) to question 17:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Without adequate safeguards in place, intense liquidity outflows are certainly a risk that could come with an EU-wide instant credit transfer scheme. The first proposed mechanism (daily limit) would certainly be effective in mitigating the risk of bank failure, however, to the detriment of efficiency. A single threshold would be a limitation for larger PSPs that may be able to safely handle more than the limit.

The EDPIA agrees with the second mechanism (temporary suspension) as an end-method if no other option is available, as this would help decrease the impact of a PSP at risk of failing. The powers of temporary suspension should be allocated to national competent authorities.

## Technical standardisation

---

**Question 18. In your view, should a single European QR code standard for instant credit transfers be available?**

- Yes, it should be developed by market participants
- Yes, it should be developed by the European standardisation organisations
- Yes, for other reasons
- No, I don't believe there should be a single EU QR code standard, because I think that the same objective could be achieved through the interoperability of existing QR codes
- No, I don't believe there should be a single EU QR code standard, because other technologies (e.g. Near Field Communication) are safer and/or more convenient

- No, for other reasons

### **Please explain your answer to question 18:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The EDPIA is in favour of a single European QR code standard for instant credit transfers, as this would guarantee interoperability at the Point of Interaction (POI). While we are generally agnostic in terms of who creates this common standard, we do have a preference for the standard to be developed by market participants, which typically operate in various standards-setting organisations and associations. We also note the European Payments Council (EPC) QR code, functional in a handful of EU Member States and the ongoing work of the Euro Retail Payments Board (ERPB) in this context. Naturally, a QR code should not be the only technical way of initiating an instant payment.

## **Horizontal aspects**

---

**Question 19. Do you believe that the widespread use of instant credit transfers could trigger risks that could negatively affect operations of a particular financial sector or pose broader societal costs (e.g., in terms of privacy)?**

- Yes
- No
- Don't know / no opinion

### **Please explain your answer to question 19:**

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

There are certainly risks which could arise with widespread use of instant credit transfers, as a push payments scheme currently does not possess the same risk control measures that a pull payments scheme does.

The EDPIA believes that thorough work is needed to build these risk control processes and risk balancing mechanisms into the envisaged instant payments scheme to protect consumers and businesses. One example of anti-money laundering checks would be to introduce an authorisation process if the instant payments is high value. This can be paired with extensive due diligence at the beginning of a business relationship and regular daily monitoring to easily spot any unusual activity.

Through constructive dialogue with industry stakeholders, certain safeguards could and should be put in place to mitigate risks.

**Question 20. Do you consider that instant payments could bring broader societal benefits, for example in terms of:**

	Yes	No	Don't know - No opinion
Financial inclusion	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public health	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Data protection	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Fiscal benefits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of broad benefits	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

### Please explain your answer(s) to question 20:

*5000 character(s) maximum*

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The EDPIA believes that rolling out instant credit transfers across the EU would bring more financial inclusion to the end-user, as the instant payments option would not be limited to a handful of EU Member States, which enhances cross-border instant payments, and (should the European Commission opt for retail instant payments to be free of charge for the consumer) banks in certain Member States would not place a (relatively) high fee for each instant credit transfer. In addition, we believe that instant credit transfers could also provide fiscal benefits, as less use of cash would help tackle illicit markets and tax evasion.

## Additional information

---

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below. **Please make sure you do not include any personal data in the file you upload if you want to remain anonymous.**

The maximum file size is 1 MB.

You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

### Useful links

[More on this consultation \(https://ec.europa.eu/info/publications/finance-consultations-2021-instant-payments\\_en\)](https://ec.europa.eu/info/publications/finance-consultations-2021-instant-payments_en)

[Consultation document \(https://ec.europa.eu/info/files/2021-instant-payments-consultation-document\\_en\)](https://ec.europa.eu/info/files/2021-instant-payments-consultation-document_en)

[Consultation strategy \(https://ec.europa.eu/info/files/2021-instant-payments-consultation-strategy\\_en\)](https://ec.europa.eu/info/files/2021-instant-payments-consultation-strategy_en)

[More on payment services \(https://ec.europa.eu/info/business-economy-euro/banking-and-finance/consumer-finance-and-payments/payment-services\\_en\)](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/consumer-finance-and-payments/payment-services_en)

[Privacy statement \(https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement\\_en\)](https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement_en)

[More on the Transparency register \(http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en\)](http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en)

## **Contact**

fisma-instant-payments@ec.europa.eu