EDPIA response to the EBA consultation on the RTS on SCA & CSC

About EDPIA: The European Digital Payments Industry Alliance (EDPIA) represents the interests of independent Payment Services Providers headquartered in the European Union. Its purpose is to contribute to EU policy debates that define the business environment for electronic payments, and to strengthen the visibility and understanding of the European payments industry amongst policy makers and society as a whole. Find out more about EDPIA and its membership here.

The European Digital Payments Industry Alliance (EDPIA) welcomes the EBA pro-actively seeking to improve the functioning of PSD2's account information regime by amending its regulatory technical standards upon strong customer authentication and common and secure open standards of communication (henceforth the RTS on SCA & CSC).

PSD2 was an innovative step for Europe's regulatory framework. It is therefore natural that PSD2 has presented various challenges through the implementation process. One of these has clearly been the customer journey's associated with the regime for accessing account information.

The EBA acting to address some of the shortcomings in the first evolution of the access regime – insofar as the PSD2 text itself allows – is a positive and practical use of its mandate to keep the RTS on SCA & CSC up to date.

In particular:

Q1. Do you have any comments on the proposal to introduce a new mandatory exemption for the case when the information is accessed through an AISP and the proposed amendments to Article 10 exemption?

EDPIA supports the new mandatory exemption.

Q2. Do you have any comments on the proposal to extend the timeline for the renewal of SCA to 180-days?

EDPIA supports extending the renewal timeline to 180-days particularly as a practical step that can be implemented in the near future. One general challenge that may be worth considering is related to the workflow and exchange of information between third parties and account providers. Our membership is providing more technical input on this and other points and would be happy to discuss it in more detail.

Q3. Do you have any comments on the proposed 6-month implementation timeline, and the requirement for ASPSPs to make available the relevant changes to the technical specifications of their interfaces not less than one month before such changes are required to be implemented?

EDPIA believes that 6-months is a realistic implementation timeline.

Of course, EDPIA also looks forward to engaging with the European Commission on the potential future review of PSD2 which could include options and discussions beyond the remit of this response.