



Brussels, 12 June 2019
Via e-mail
BRU/ECSAS/152/2019

To: **Sabine Lautenschläger**,
Member of the ECB's Executive Board and Chair of the ERPB

Subject: ERPB SEPA API Access Scheme

Dear Ms. Lautenschläger,

We are writing to you with regard to the ongoing ERPB work on a SEPA API access scheme ahead of the Euro Retail Payments Board (ERPB) meeting, taking place on 13 June.

We as the European Credit Sector Associations have been actively involved in the dedicated working group on the topic. As you know, the working group was created to conduct exploratory work on a possible SEPA API scheme that would be a step towards wider 'open banking', building value-added services beyond PSD2. The ECB rightly positioned this work as a market initiative where a major success factor and a key underlying principle is the need for any scheme to be mutually beneficial for all participants and the possibility of all participants to derive value from the services offered within a scheme.

In the last months, we have intensely worked on delivering the report that is now tabled on the ERPB meeting agenda. We believe we have had good collaboration between the different stakeholders involved in the work and that the report presents a good starting point for further work in this area. We therefore endorse the report and support ongoing efforts to progress the matter.

We have been recently made aware of the objections by part of the working group's membership – namely the third party provider (TPP) community and the EMA – to endorse the next steps included in the report, which would effectively result in delaying any further progress of the work for an undefined period of time and by no means before late 2019. The exact moment to resume the work would indeed seem to depend on their appraisal and their interpretation of the implementation of the Regulatory Technical Standards on Strong Customer Authentication and Common and Secure Communication (RTS on SCA&CSC). Whilst we understand and appreciate that the implementation of PSD2 and the RTS as per 14 September have to be the baseline upon which the scheme can be developed, we do not believe that this should prevent us from advancing our work. Additionally, we would like to avoid that this concern leads to longer-term postponement of work. The ECB and the European Commission have emphasized the need to progress and we share this assessment.

We would therefore like to express our commitment to constructively continuing the work as proposed in the next steps, based on the principles included in the working group's report. We believe that the forward-looking conceptual work of this group is both vital for the future of payments in Europe and independent of the ongoing PSD2 baseline implementation. We suggest that the ERPB supports that some immediate next steps can be undertaken, such as a crosscheck with other ongoing relevant initiatives, further exploratory work on the payment-related aspects and discussing the work with other European institutions.



It is our firm hope that in its meeting of 13 June the ERPB embraces the positive work undertaken by this group by agreeing on actively continuing its work, and we kindly request you to share this document with the ERPB members prior to the next ERPB meeting.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Wim Mijs', written in a cursive style.

Wim Mijs
EBF Chief Executive

A handwritten signature in blue ink, appearing to read 'Chris De Noose', written in a cursive style.

Chris De Noose
ESBG Managing Director

A handwritten signature in blue ink, appearing to read 'Hervé Guider', written in a cursive style.

Hervé Guider
EACB General Manager