

Annual Stock Taking Exercise Report

ERPB meeting - November 2025



The European Payment Stakeholders Group (EPSG) is an International Non-Profit Association located in Brussels. The main task of the EPSG is the definition of SEPA requirements for payment services. The Association is governed by the provisions of the Belgian Companies and Associations Code. Its membership is open to any entity which is active in the market for payments services in an EEA Member State. According to this scope the EPSG as a multi-stakeholder group brings together the following industry sectors along the value chain of payment services:

- Retailers
- Vendors (manufacturers of cards, payment devices, and/or related IT systems);
- Processors (of payment transactions);
- Schemes and
- Payment Service Providers.

The European Central Bank is invited to attend the meetings of the bodies of the EPSG as an Institutional Observer.

The primary focus of the work of the EPSG is the 'SEPA Payments Standardisation Volume'. Developed and agreed by all relevant sectors active for payments in Europe, it demonstrates a strong self-commitment of the European stakeholders within the payment ecosystem and is well recognised by the European Central Bank and the European Commission. In accordance with the vision of Single Euro Payments Area (SEPA), the purpose of the Volume is to enable payment standardisation and promote interoperability of payment transactions in a secure environment throughout the SEPA region. The VOLUME aims to do this by defining a set of harmonised SEPA requirements ('SEPA Payment Standards') applicable to payments, card payments and beyond.

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1. Executive Summary

For the 11th consecutive year, the European Payments Stakeholders Group (EPSG) welcomes the opportunity to report to the ERPB the status of the preceding 12 months' work on SEPA Cards standardisation.

Of course, a significant part of the EPSG's work in 2024 was dedicated to implementing the decision made on 1 December 2022 to expand the scope beyond card payments. To implement this decision, it was necessary in a first step to align on a basic approach to structuring the SEPA Payments Standardisation Volume (SPS Volume) for this new scope, which allows the EPSG's working structure to allocate the Volume Books, the necessary resources and budget. This was achieved during the Board meeting on 16 November 2023. Following this, a common understanding was needed about the nature of Instant Payment (IP) in order to identify the SEPA requirements for the Volume, based on the comprehensive overview previously delivered by the Transition Task Force, which identified several different types of IP implementations compared to the well-standardised card payments. Therefore, in 2024 a dedicated IP Flows Task Force worked on this objective and is still providing the necessary input for the Expert Teams to enhance their books accordingly and on common ground.

Initial steps of the work for the integration of IP in the Volume are therefore in progress and are described in more detail in this document.

Beyond this decisive aspect, the EPSG activity in 2024-2025 focused on continuing the preparation of Version 11 of the Volume in line with its three-year release schedule, exceptionally extended by one year to cater to the one-off task of restructuring it by adding I. The following work items can be listed in this regard:

- A Bulletin to update the Book 1, Book 2 and Book 4 of Volume v.10 in order to include Elliptic-Curve Cryptography (ECC) cryptography [was published](#) in May 2024 and will be integrated in v.11 of the Volume.
- The integration of security requirements for the so-called COTS solutions in Book 4 was completed by defining requirements for PIN-based COTS payments basing on the industries' security programmes. Updates related to 2025 publication of relevant standards have been applied.
- The integration of functional and security requirements for ICT Transactions, including those initiated via QR Codes or NFC/Contactless Interfaces.
- The complete revision of Book 6 gained momentum. The Book was enhanced by the topics of staged wallets, transparency, accessibility and choice of application for contactless cards.
- The Labelling process continued and was enhanced by enabling a labelling of security requirements listed in Book 4.
- The Innovation Expert Team continued the work which has resulted in the publication of the first Taxonomy on Wallets and their use cases for Payments. A complete

document which includes functional aspects, technical specificities, business and legal considerations. See details in section 4.3 below.

- The EPSG has anticipated the future technical work in the Volume to be produced by actively participating with advisory roles all along 2025 in two EUDIW Large-Scale Pilots, Nordic-Baltic eID Project (NOBID) and the European Wallet Consortium (EWC).
- The evolution of Post-Quantum Cryptography remains to be continuously observed and assessed by the Inno Expert Team. The EPSG has started the revision of the Card Payments Cryptography Strategy document published by the ECSG in 2020 to take into consideration innovation and new trends in cryptographic technology. See details in section 4.2 below.
- The EPSG aligns its internal working structure to better handle the increasing amount and pace of legislations that impact payments and payment services. A dedicated Payment Legislation Expert Team (PLET) was established for analysing the impact of all payment-specific legislation such as PSD/PSR, IFR, CBPR, IPR, WTR, SEPA Regulation etc. PLET will also act as first point-of-entry for all new legislations, to decide if it falls within the payment-specific scope of PLET. For legislation considered out of scope of the PLET, i.e. non-payment legislation such as AMLD, GDPR, DORA, CRA, etc., PLET will refer it to the Innovation Expert Team (INNO ET), which will assess the legislation by means of a *Regulatory Volume Inclusion Assessment Criteria* (R-VIAC) document, in order to evaluate the degree of Volume impact, and propose next steps if the expected impact is deemed significant enough for an inclusion in the Volume. The Digital Operational Resilience Act (DORA) was the first candidate to be analysed by an R-VIAC.
- nexo standards became a new EPSG member in the Standards Observers category. As nexo standards provides worldwide comprehensive implementation specifications of a terminal application and terminal interfaces – the latter are based on ISO 20022, a closer cooperation targeting at a better standardisation can be achieved.

2. The new activities of the European Payments Stakeholders Group

The General Assembly decided to expand the scope of the association beyond card payments during its meeting on 1 December 2022. Since then, a Transition Task Force dedicated to the management of the transition prepared the necessary decisions about the precise definitions of the new scope as well as how to integrate the new Instant Payments domain into the Volume Books. This allows for the Board decisions to work on “Instant or Account-to-Account Payments” – the normalised term adopted in the Volume will be “Instant Credit Transfers (ICT)” – in a first step for version 11 of the Volume and to integrate the new requirements into the existing Books instead of working on separate Books for ICT requirements.

More information about the status achieved in 2025 is given in section 4.1.

In this regard, the EPSG strengthened its contacts to Instant Payment schemes and initiatives like EuroPA, an initiative of southern European IP schemes, which has recently started its processing activities. The European Payment Initiative EPI is already an EPSG member.

3. Update on Payments standardisation in Europe

The Volume v.10 was released in October 2022.

3.1 2023-2025 Volume cycle towards v.11

In 2024 the EPSG decided to postpone for one year the publication of the Volume v11, as a waiver for the three-year release schedule rule between two consecutive versions of the Volume. The reason was that the technical and editorial effort to integrate Instant Credit Transfers in the Volume was underestimated. In consideration of the extra technical and editorial effort to start integrating Instant Credit Transfers in the Volume, in 2024 the EPSG exceptionally decided to postpone for one year the publication of the Volume v11, as a waiver for the three-year release schedule rule between two consecutive versions of the Volume. Therefore, the EPSG's activity in 2025 was focused on continuing the preparation of Version 11 of the Volume that for the first time will also include requirements for SEPA Credit Transfers (SCTs). These updates impact all Books of the Volume. The public consultation of version 10.5 will start in Q4 2025.

The Bulletin to update the Book 1, Book 2 and Book 4 of Volume v.10 in order to include Elliptic-Curve Cryptography (ECC) cryptography, published in 2024, was integrated in version 11.

Version 11 will also include provisions facilitating compliance with regulatory requirements related to transparency and accessibility applied to payment systems. The following section of this document provides details.

For version 11, the EPSG for the first time took the opportunity to perform complete reviews of some parts of the Volume. Thus the Book 6 Expert Team reviewed much detailed information given in Book 6, e.g. the list of MCCs in section 2.4.2 or changes applying to section 3.4 for Account Data retrieval. Several figures were updated and other retrieval modes were included for the retrieval of Stored Account/Card Data and via SRC. The structure and content of Sections 4 and 5 were completely reviewed, references were cleaned and, last but not least, implementation guidelines for accessibility were integrated.

3.2 Regulatory Updates

Over the last decade we have seen an increasing amount and pace of legislation that impacts payments and payment services; both payment-specific legislation such as PSD/PSR and IFR, as well as non-payment legislation such as AMLD, GDPR, DORA, CRA, etc. This has made it necessary for EPSG to pay specific attention and time to analysing in depth the content of new legislation from a multi-stakeholder perspective, in order to find out whether there is impact specific to EPSG scope that may deserve subsequent work at the different Expert Teams (ETs) and result in new or changed requirements or guidelines in the Volume, and/or in some cases also impact EPSG's ways of working and EPSG communication.

For that reason, the EPSG Board has decided to optimise the internal processes for a more efficient analysis and impact assessment of the relevant EU regulatory frameworks. The work is likely to be carried out along the following three concrete lines of action:

1. The categorisation of relevant EU legislation in five domains: Payments, Cybersecurity, Data Protection, Access to Payment Services and Anti-Money-Laundering.
2. The prioritisation of the evaluation of new legislation: DORA, CRA and the new proposals for PSD3 and PSR.
3. The transformation of the former PSD2 Task Force into a permanent working group, the Payments Legislation Expert Team (PLET).

This strengthening of our internal processes will improve how well and fast we evaluate the impact of EU legislation on the Volume and on EPSG's ability to make appropriate accommodations if needed.

Last year, the Volume Sub-group paid particular attention to the evaluation of legislation improving the consumer experience:

- (1) by identifying guidelines to facilitate access to payments for persons with special needs, and
- (2) by integrating in the Volume the ERPB's recommendations on Transparency for retail payment end-users.

The EPSG wishes to draw the ERPB attention to the concerns expressed by some EPSG sectors with respect to the new evaluation and certification framework mandated by the Cyber Resilience Act (CRA), which is applicable also to payment products. With that respect, the EPSG highlights that long-term Payments Industry security evaluation practices already enable to comply with the CRA requirements for the cybersecurity of products with digital elements. Therefore the EPSG considers that this sectorial industrial reality should be recognised by the CRA Regulatory Technical Standards being produced by the CEN.

3.3 Progress in Volume Conformance

The Volume Conformance Management Committee (VCMC) has continued its ongoing activity of evaluating and granting labels for implementation specifications.

The main pan-European implementation specifications have obtained the conformance label, the detailed status of the labelled specifications can be accessed on the [VCMC web page](#).

As explained in the last report the Labelling process was enhanced in 2024 to gain more clarity and to give a higher degree of accuracy to the Self-Assessment process, both for the applicant and for the VCMC. A first labelling applicant is just going through this more detailed process and is expected to be finalised by Q4 2025.

As part of the adaptations necessary to implement the expanded scope into the different EPSG processes and workstreams, the Book 5 Expert Team investigated the need to update the necessary processes and documentation in place to accommodate the labelling of non-card implementation specifications. As conformance processes for SCT schemes are very similar to those applying for card schemes, the updates were minimal.

3.4 Annual Report on ISO 20022 initiatives in the card Acquirer to Issuer Domain

3.4.1 Context

Since 2017, the ECSG (now EPSG) Volume Sub-Group has been monitoring the status of the initiatives to use ISO 20022 in the card A2I domain in the market, in order to identify specific SEPA requirements to be taken into account, e.g., triggered by Schemes or by legislation.

3.4.2 Current status

As of the date of this report, no new initiative using ISO 20022 in the card A2I domain has been identified in the market.

The same two initiatives as last year are using ISO 20022 in the card A2I domain.

- The SEPA Card Clearing (SCC) Framework, which specifications have been labelled as conformant towards the SCS Volume Version 8.0, and the conformance has been renewed against v9.0.
- ATICA provides a specification covering the full transaction life cycle (Authorisation, Clearing, Settlement and Disputes) within the Acquirer to Issuer environment. The latest version is version 4, published by ISO in August 2024.

3.5 ISO 20022 initiatives in the Terminal-to-Acquirer Domain

nexo standards, the not-for-profit organisation involved in standardising the exchange of data between all payment acceptance stakeholders, who joined the EPSG last year in the quality of Standards Observer, while continuing its work in the card payment domain, is now also covering account-to-account payments, not only in Europe but also in Africa which sees a strong push on this kind of payments.

3.6 Standardisation progress in the Card-to-Terminal, Terminal-to-Acquirer and Acquirer-to-Issuer domains

The main activities on the Volume consist of:

- Integration of the Bulletin about ECC (Elliptic-Curve Cryptography) published in 2024 in Volume v11, namely the protocols XDA for contact, BDH Secure Channel and RRP for contactless transactions.
- Comprehensive review of Book 6 including the topics of staged wallets, transparency, accessibility and choice of application for contactless cards
 - Finalise the work for the integration of SCTs in the Volume for the public consultation of version 10.5 in Q4 2025

- Comprehensive update of Book 1 to include the new terminology and references for SCTs and to provide for a description of this new requirements domain
- Review of the Book 2 Scope section and requirements to update services, acceptance technologies, transaction environments and functions to be covered for the integration of instant payments
- Definition of how to integrate instant payment-related data in Book 3 and its data sheet
- Update of the descriptions of conformance processes and roles in Book 5
- Update of the implementation guidelines for ICTs
- Definition in Book 7 of an instant payment processing framework based on the current card framework, and subsequently define a general processing framework.

3.7 Standardisation progress in the Terminal Security domain

Following the agreements on the new concepts for ICT Transactions the Book 4 aligned with the new approach for authentication and restructured the Book accordingly. Security requirements for ICT Transactions were included in the Book, a new descriptive section was included in section 2 of the Book.

4. Ongoing EPSG activities for Volume v11

The EPSG continues to monitor the impact of technological innovation, payment-related regulations and the initiatives of other standards bodies on the development of card and non-card payments in SEPA to prepare v11 of the Volume.

4.1 Integration of Instant Payments within the Volume

The EPSG faced different challenges for the consistent integration of instant payments in the next release of the Volume. Compared with the well harmonised payment card systems, instant payments in the EU market rely on a diversity of processing channels. New roles had to be considered for instant payment use cases, e.g. Third Party Payment Service Provider (TPP) as intermediaries according to the PSD2 and initiating an instant payment by connecting to the API of the payer's bank. That adds to the complexity of the instant payment flows and creates security vulnerabilities.

To progress, the EPSG launched the Instant Payment Flows Sub-Group (IPFSG). This Sub-Group has created the EPSG's first approach of the harmonised primary instant payment models and associated transaction flows, providing the industry with valuable insights to navigate this evolving landscape. The approach is published under www.e-psg.eu/documents and has been provided to several interested organisations, e.g. to the ERPB.

All EPSG Expert Teams were aligned on this approach via the Volume Sub Group to ensure a harmonised common understanding to achieve consistency through all Volume Books. As a minimum the use case of "One-off Payment" was agreed to be covered in version 11 of the Volume as the first step, but based on the achieved common ground all Expert Teams can already deliver a complete update for instant payments for the public consultation of version 10.5.

The main achievements of this basic work are the following:

- 1) Agreement on the necessary new and aligned terminology outlined in Book 1:
 Version 11 will describe the two categories of Payment Instruments "Payment Card" and "Instant Credit Transfer (ICT)" performing "Card Transactions" and "Instant Credit Transfer (ICT) Transactions" as Payment Transactions. Terms well known from the Payment Card domain were aligned, e.g. the terms "Issuer" and "Acquirer".
- 2) The Agreement of the general concept of "Authentication" covering now all methods to achieve Strong Customer Authentication with the known SCA factors, which is now a much better structured approach than the former approach mainly linked to the card based EMV methodology.
- 3) The Agreement on a first list of requirements for a "Selection of Payment Solution".

4.2 Evolution towards enhanced cryptography

As explained in the last ERPB Report, the EPSG approved a bulletin for the integration of functional and security requirements for Elliptic Curve Cryptography (ECC) for card payments in 2024, which is now integrated in new definitions (Book 1), functional requirements (Book 2) and security requirements (Book 4) for version 11.

The EPSG published its position on Post Quantum Cryptography under www.e-psg.eu/documents in the first half of 2020. Since then, it continues to mirror all payment relevant progress made in this regard. To be able to provide for actual advice to its stakeholders, the evolving work of the standardisation bodies worldwide (BSI, EMVCo or NIST) is under permanent review in EPSG's Innovation Expert Team. This leads to an update of the above-mentioned presentation on the web site.

4.3 Digital wallet use cases for Payments

The EPSG continued to discuss the role of Digital Wallets to support use cases for instant and/or card payments and made a first ambitious attempt to structure and explain the complex world of these multi-purpose implementations.

The Innovation Expert Team (INNOET) developed a comprehensive taxonomy of Digital Wallets to provide a clear understanding of the topic and assess whether high-level concepts and definitions should be integrated into the Volume at a later stage.

This taxonomy outlines key use cases, including online shopping, in-store payments, and identity verification. It categorises digital wallets into pass-through, staged, and device-based models, offering detailed insights into their architectures and functionalities. The expanding functionality of digital wallets was highlighted and their evolving role in the payments ecosystem over the next 5-10 years. Upcoming regulations and innovations, such as open banking, digital currencies and NFC, are expected to reshape digital wallet business models significantly.

The taxonomy is published under www.e-psg.eu/documents.

The e-IDAS Wallet supports security functionalities such as Strong Customer Authentication including a qualified electronic signature. These functionalities could be used by banks (1) to identify a new end-user (for Know-Your-Customer conformance), (2) authenticating a payment transaction (3) to provide end-users with more control over shared personal data and (4) facilitating financial inclusion.

Aware of the potential of e-IDAS Wallets, the European Commission in collaboration with different governments has organized several EUDIW Large-Scale Pilot Projects. They are intended to prove the feasibility of e-IDAS Wallets to support payment-related use cases. In the EC views, the acceptance of e-IDAS Wallets to pay could significantly improve customer journeys.

Following invitations of two of these EUDIW Large-Scale Pilots, Nordic-Baltic eID Project (NOBID) and the European Wallet Consortium (EWC), the EPSG has accepted a

collaboration and an agreement has been signed for the two co-chairs of the Innovation Expert Team (INNO ET) to participate in both projects.

4.4 Cooperation with the ERPB

The association continued during the last year to collaborate with the ERPB.

The main collaboration regarded the follow-up on the recommendations issued by the ERPB on the topic of Transparency for retail payment end-users, followed by the impact assessment endorsed by the July 2022 ERPB meeting.

The EPSG's contribution has consisted in the updating of the EPSG's SEPA Payments Standards Volume.

The following Volume's Books have been identified to receive updates, facilitating the adoption of the ERPB's transparency recommendations:

1. Book 2: definition of functional requirements for SEPA payments, via a reference to Book 6 for detailed guidance on the use of the merchant's name;
2. Book 6: guidance on practical examples for implementation;
3. Book 7: outline of business principles and requirements for market access and participation in payment processing services;

Furthermore, in addition to the above, the terminology used in the Volume needed to be enhanced with new definitions to support these integrations.

The update work of all Books, 2, 6 and 7 is now complete and also the update of the Volume glossary and definitions. All the changes will be part of the Volume version 11 currently in preparation.

The EPSG continues to report on the implementation of standards related to the extended scope, i.e. card and non-card payments (the present document).

4.5 Innovations in Card and Instant Payments

The Innovation Expert Team (INNO ET) has continued evaluating technologies for potential inclusion in the Volume v11. These technologies are applicable to card and/or instant payment implementations. The INNO ET also (1) advises the EPSG Board in terms of priorities for standardisation, (2) supports the technical work of the EPSG Expert Teams and (3) evaluates the potential impact for the Payments Industry of regulatory texts (e.g., DORA, CRA, Data Act) in collaboration with the Payment Legislation Expert Team (PLET).

In 2025, the INNO ET has focused on the following:

1. The production of the Taxonomy for Digital Wallets and Payment Use Cases. Refer to section 4.3 for details.
2. Enhanced monitoring of the progress of Quantum Computing and Post-Quantum Cryptography. Refer to section 4.2 for details.

3. Representing the EPSG in the Board of Advisors of NOBID and EWC Pilots on the payment use cases for the EUID Wallet and inviting EWC representatives to describe the outcome of the Project.
4. Discussed and escalated to the EPSG Board the CRA case and the way the EPSG could play a potential role in the CRA evaluation process.
5. Discussed and aligned with EMVCo of new standardisation initiatives relevant for the EU payments industry to be endorsed by the Volume v11.
6. Presented and discussed innovative authentication methods (W3C Secure Payment Confirmation, FIDO 2) and their potential extension to Instant Credit Transfers.
7. Produced a first analysis of the impact of the Data Act on the Payments Industry

In 2026, the INNO ET is planning to investigate/collaborate:

- Areas of collaboration/overlap between the Digital ID and the Payments industries, starting with the reference architecture of the EUID Wallet framework.
- Completion of the Taxonomy of Digital Wallets incorporating the EUIDW Wallet and the outcome of the NOBID and the EWC pilot projects.
- Provide recommendations and a schedule for the integration of EUDIW-related relevant aspects in the Volume (e.g. in form of a Bulletin after publication of Volume v11, or directly in Volume v12).
- Monitor progress of the new FIDO Payments Working Group and the possible endorsement of their recommendations.
- Contribute to evaluate the impact of the announced regulatory framework for payments under the authority of the EPSG PLET.
- Evaluation of the second set of NIST post-quantum standards.
- Analysis of the announced EC Program for the Post-Quantum migration of sensitive EU infrastructures and the impact for the Banking/Payments industry.
- Review of the original taxonomy for Internet of Things (IoT) considering new use cases for SCA and Card Payments in specific contexts (e.g., hands-free payment at petrol station).

4.6 Collaboration with standardisation bodies and specification providers

The EPSG continues to extend its collaboration with internationally recognised Standards bodies for payments and/or authentication methods. They include:

- Enhancement of technical collaboration with EMVCo in view of the publication of Volume v11
- Start of a regular collaboration with the W3C and FIDO Payments Working Group in areas such as online transaction authentication using their standardized functionalities based on Browsers
- nexo standards decision to join the EPSG as a Standards Observer to improve consistency for their technical specifications
- The aforementioned collaboration agreement with NOBID and EWC on the e-IDAS Wallet use cases for payments
- Build up a liaison with CEN and ETSI about the current standardisation of requirements defined in the Cyber Resilience Act.
- Start of a cooperation with the EuroPA initiative in the field of ICT Transactions.

5. Conclusion

In 2024 the EPSG succeeded in paving the way to implement properly the decision to expand its scope beyond card payments. Via dedicated Task Forces and the support of its permanent working structures it became increasingly clear how to integrate the new and less harmonised payment means of Instant Payments. It will be more than interesting to learn after the consultation phase in 2025 how the different markets and stakeholders assess the chosen approaches.

However, the evolutions of card payments in terms of innovation (e.g. further programmes for the use of mobile-off-the-shelf devices as payment terminals and enhancements for contactless payments), and the changes in the technological context (e.g. the eIDAS Regulation, digital Wallets and, still, enhanced cryptography following the advance in quantum computing), remain constant challenges to be reflected in Volume v.11. The invitations of the Nordic-Baltic eID Project (NOBID) and the European Wallet Consortium (EWC) for participation were accepted by the EPSG and showed that the EPSG's relevance in these innovative projects is recognised.