

Template for comments

Public consultation on the draft ECB Regulation amending the Regulation on payments statistics

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General comments

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Public consultation on the draft ECB Regulation amending the Regulation on payments statistics

Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant article/chapter/paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline:	7 May 2020
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ID	Chapter	Article	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Regulation	Recitals	Recital (10)	3	Amendment	With the aim to reach meaningful timelines the new reporting requirements should be introduced at the beginning of a new year. Comparisons of statistical developments over a longer period of time are only possible on an annual basis. The 2021 reference year should therefore be completed in full under the current reporting requirements. The first reporting under the new scheme would then have to be made for the first quarter of 2022. Therefore recital (10) should read as follows: "(10) In order to allow reporting agents sufficient time to prepare and to reach meaningful timelines of the current statistical data, the new reporting should start with the beginning of 2022."	The current reporting on an annual basis will be brought to a proper conclusion. This will facilitate the comparability of the data for the public and interested parties.	Ante, Horst	Publish
2	Regulation	8	1 and 2	5	Amendment	See comments on recital (10): Entry into force of the new reporting requirements with effect from 1 January 2022. Article 8 should read as follows: "Reporting to the ECB shall begin with the data of the first quarter of 2022 by end-may 2022."	The current reporting on an annual basis will be brought to a proper conclusion. This will facilitate the comparability of the data for the public and interested parties.	Ante, Horst	Publish
3	Annex III	Table 4a			Amendment	The "payment transactions received" should be reported with the geographical breakdown "Geo 1". See comments on Table 9 (ID 5)	The burden on the reporting agents will be eased.	Ante, Horst	Publish
4	Annex III	Table 9			Amendment	"Money remittances" and "Other payment services" should also be reported in Table 9. This would facilitate reconciliation with Table 4a, in particular with the item "Total payment transactions ...". It is also a prerequisite for the implementation of proposal ID 5.	The comparability of the (total) data in tables 4a and 9 will be facilitated.	Ante, Horst	Publish
5	Annex III	Table 9			Amendment	The "transactions received" for all payment instruments should be reported in Table 9 with the geographical breakdown "Geo 1". On the basis of all data thus available (sent and received), the "payments transactions received" for all countries could be determined automatically (by the system) on a quarterly basis with the geographical breakdown "Geo 3" (e.g. DE -> AT sent = AT received). In Table 4a the "received" data could then also be reported with the geographical breakdown "Geo 1".	The "received payments" can be determined faster and automatically with the desired geographical breakdown "Geo 3". At the same time, the burden on the reporting agents will be eased.	Ante, Horst	Publish