



Joint Statement

The representatives of the two European Third Party Providers associations ETPPA and FDATA, hereafter: “the TPPs” and the three European Credit Sector Associations, hereafter: “the ECSAs”,

Considering

- a) The ECSAs and TPPs fully support the political goals of PSD2 and share the ambition to make it a success;
- b) The ECSAs and TPPs recognize that the full legal implementation of PSD2 and the RTS on SCA and CSC will be completed on 14 September 2019;
- c) The ECSAs and the TPPs acknowledge that from a forward looking technology perspective the preferred way ASPSPs give access to relevant accounts is through APIs;
- d) The ECSAs and TPPs recognize that the successful implementation of PSD2 is a pre-requisite to reap the full benefits of it and for taking further steps beyond PSD2, which is on the agenda of the ERPB SEPA API Access Scheme Working group;
- e) The ECSAs and the TPPs should therefore do everything reasonably possible to avoid “customer detriment” of their mutual customers within the legal boundaries PSD2, the RTS and other relevant legislation;
- f) On 10 July 2019 the European Commission organised a joint workshop at which staff from EBA were present as observers. Arguments were exchanged by ASPSPs and TPPs. It was agreed that a small task force would endeavour to draw up a “gentlemen’s agreement” that might possibly address some of the issues;
- g) The ECSAs and TPPs subsequently drew up this current joint statement in good faith.

Have agreed to the following on a best effort basis:

- 1) The parties agree to call upon ASPSPs to provide contingency relevant documentation in their developer portals, more specifically on TPP identification and use of SCA in such contingency scenario. ASPSPs and TPPs shall collaborate for a coordinated and progressive SCA implementation within the boundaries of the law.
- 2) The parties agree to call upon ASPSPs and TPPs, to neutrally communicate to PSUs about the changes brought by the introduction of new SCA methods.
- 3) The parties agree to call upon the ECSA membership to populate and promote transparency initiatives, such as the existing central transparency register maintained by NISP, which contains at minimum the ASPSPs official name, a link to their PSD2 related developer portal and a relevant contact point either email or phone.
- 4) The parties agree to call upon the TPP’s representative associations to call upon their memberships to intensify testing the APIs that are currently available in developer portals and provide relevant feedback to the ASPSPs.
- 5) The parties agree to call upon the NCAs to use the possibilities given to them within the law to the maximum extent possible to help avoid unintended customer detriment.
- 6) The parties agree to call upon the relevant authorities to consider urgently the legal possibilities to solve the unintended consequences of 90 day SCA renewal in the context of AIS, taking into account other stakeholder’s views.
- 7) The parties agree to continue their constructive dialogue towards the 14 September deadline and agree to maintain the task force referred to in consideration f) to monitor progress on a regular basis.

Brussels, 26 July 2019.