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**Summary of the 4<sup>th</sup> Meeting of the  
API Evaluation Group**  
**28 February 2018, 09h00-10h30 CET**  
**EBF, Avenue des Arts 56, 1000 Brussels**  
**(Approved by the API EG Members)**

### 1. Welcome and introduction

The co-chairs, J. Whittle (NPSO Ltd) and O. Berglund (Trustly Group AB) welcomed the participants to the fourth meeting of the API Evaluation Group (EG) which mainly focused on the preparation of the API Evaluation Workshop which was scheduled to take place at 11h00 CET on the same day. Workshop participants will include API EG members, nominated technical experts and representatives of the five API standard initiatives (i.e. the Berlin Group, Open Banking UK, Stet, Polish Bank Association and Slovak Banking Association).

### 2. Terms of Reference (API EG 002-18)

An updated version of the terms of reference, including the comments received from the EBA was approved by the API EG.

An account information service provider (AISP) representative however asked whether it could already be confirmed whether the extension of the scope to other accounts would be discussed once the API EG has completed its review of PSD2 related topics. He added that in France it had been communicated that this discussion should be held on a European level instead of a national level. Account-servicing payment service provider (ASPSP) representatives however commented that they have no mandate to discuss other types of accounts.

### 3. Technical expert subgroups

A. Mac Dowell presented a document - created with the help of the co-chairs – which provided an overview of the five subgroups (i.e. the Berlin Group, Open Banking UK, Stet, Polish Bank Association and Slovak Banking Association) and the technical experts allocated to each subgroup. The aim is to ensure that each subgroup is composed in a balanced way without a conflict of interest. A coordinator was also appointed for each subgroup.

The subgroup allocation was reviewed and some changes were made following comments from API EG members.

The EMA representative informed that EMA would nominate an additional technical expert in due course.

Also, during the 27 February 2017 API EG meeting it had already been agreed that it would be beneficial to provide some guidance to the technical expert subgroups for example to ensure that written feedback to the API EG would be done in a harmonised way (via the provision of a template). J. Whittle presented a paper which included a high-level description of recommended ways of working. This document was approved by the API EG.

It was furthermore clarified that the EPC would not be in a position to provide support to the technical subgroups. It will hence be the task of A. Mac Dowell, as linking pin between the technical experts and the API EG, to help the subgroups to be as effective as possible from an organisational point of view.

### 4. API requirements

The API EG agreed to present the first eight API standard requirements<sup>1</sup> during the API Evaluation Workshop (see Annex IV). It would also be important to help manage expectations in this regard in particular in relation to the fact that the API EG itself would require further time to assess the complete list of requirements. The list of requirements should in any case be seen as a living document.

### 5. Key topics which need to be further clarified

The API EG concurred on a list of key topics (the so called 'hot topics') for which further clarification would be needed. Several members volunteered to be allocated to one or more of these key topics (see Annex V). The topic of 'redirection' and 'AIS data' were considered to have the highest priority.

The API EG concurred that the list of key topics could already be disclosed to the participants of the API Evaluation Workshop.

Members assigned to a key topic are invited to prepare an input document. This document should not yet be a comprehensive report but rather provide a clear and factual description of the problem statement (e.g. including observations, different views & perspectives) in order to get a better understanding about the potential issues.

Regarding the topic of PSD2 consent in the context of the General Data Protection Regulation (GDPR) it was hoped that the EC would be able to provide some further clarity. The EBF representative suggested to share the EBF's legal analysis on the topic of consent with the EC. R. Jacob on the other hand commented that the API EG should also check what the API standard initiatives are doing in this context, and that this should be done rather quickly.

There was a discussion on whether the November 2017 report of the ERPB Working Group (WG) on payment initiation services (PIS) could be used as a basis for the topic of redirection. Although there was no consensus, it was reiterated that it should be acknowledged that the document is now in the public domain. It is hence the role of the API EG to get a clear understanding of what a good versus bad API looks like. J. Whittle reminded that the discussion should be about what a good customer journey should look like.

### 6. Closure of the meeting

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<sup>1</sup> The API EG reviewed these eight requirements during its 27 February 2018 meeting.

## API Evaluation Group

The co-chairs closed the meeting around 10h45 CET. It was reiterated that the API EG should clarify in a unified way to the API standard initiatives that the common aim is to increase the chances of getting an exemption from providing a fallback solution (under the RTS).

**Annex I: List of attendees**

Category	Name	Institution	Attendance
Co-Chairs	James Whittle	NPSO Ltd	Yes
	Oscar Berglund	Trustly Group AB	Yes
TPP Members	Joan Burkovic	Bankin'	Yes
	Aoife Houlihan	Klarna	Yes
	Ralf Ohlhausen	PPRO	Yes
ASPSP Members	Marieke van Berkel	EACB	Yes
	Gijs Boudewijn	Dutch Payments Association (representing EBF)	Yes
	Emil Johansson	Swedbank (representing ESBG)	Yes
PSU Members	Jean Allix	BEUC	Yes
	Pascal König	Ecommerce Europe	Yes
	Pascal Spittler	IKEA (representing EuroCommerce)	Yes
Other Members	Ruth Mitchel <sup>2</sup>	EMA	Yes
	Krzysztof Korus	Polish Payment Institution Association (representing EPIF)	Yes
Observers	Ralf Jacob	European Commission	Yes
	Nilixa Devlukia	EBA	Yes
	Iddo de Jong	ECB	Yes
Linking pin with technical experts	Arturo G. Mac Dowell	Eurobits	Yes
Guest	Lorenzo Gaston	Gemalto (Convenor ISO TC 68 / SC2 / SG1 TPP)	Yes
Secretariat	Etienne Gousse	EPC	Yes
	Christophe Godefroi	EPC	Yes

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<sup>2</sup> Alternate to Thaeer Sabri

**Annex II: Action points**

Item	Action	Owner	Status / Deadline
4-01	Prepare input document on key topics (see Annex V)	AP EG members that were allocated to work on one or more key topics	20 March 2018

## Annex III Meeting Calendar

2018	API EG Meetings
January	<p align="center"><b>29 January 2018 (11:00-16:00 CET)</b> EPC, Brussels</p>
February	<p align="center"><b>22 February 2018 (10:00-12:00 CET)</b> Conference call</p>
	<p align="center"><b>27 February 2018 (13:30–18:00 CET) – preceded by lunch as from 12:45 CET</b> EPC, Brussels</p>
	<p align="center"><b>28 February 2018 (9:00-10.30CET)</b> <b>28 February 2018 (11:00-16:00 CET) API Evaluation Workshop with 5 API standards initiatives</b> EBF, Brussels</p>
March	<p align="center"><b>27 March 2018 (09:00-17:00 CET)</b> Brussels – EPC</p>
April	<p align="center"><b>25 April 2018 (10:30-16:00 CET)</b> Brussels – Venue to be confirmed</p>
May	<p align="center"><b>29 May 2018 (10:30-16:00 CET)</b> Brussels – Venue to be confirmed</p>
June	<p align="center"><b>25 June 2018 (10:30-16:00 CET)</b> Brussels – Venue to be confirmed</p>

## Annex IV: API standard requirements - Input to the 28 February 2018 API Evaluation Workshop (work in progress)

N°	Description of API Standard Requirements	Rationale
1.	The API standard should enable both AIS and PIS in one single combined (technical) communication session.	Smooth integration in a technical communication session for all the roles in scope of PSD2 (AIS & PIS).
2.	The API standard should support PIS and AIS for online payment accounts (individual/consumer and corporate payment accounts).	
3.	<p>The API standard should enable the following role-based access:</p> <ul style="list-style-type: none"> <li>(i) a "pure PIS" user journey, implying the payment execution SCA only;</li> <li>(ii) a mixed AIS/PIS journey in one session, implying one SCA to view data (including for example balances and account related data), and one payment execution SCA;</li> <li>(iii) a "pure AIS" journey, implying one SCA to view data (no payment execution);</li> <li>(iv) Card based payment instrument issuer (CBPII) confirmation of available funds.</li> </ul>	
4.	The API standard should not require any additional checks of the consent given by PSUs in addition to the consent given to the TPP.	
5.	The API standard should allow for the ASPSP and TPP to fulfil all their legal obligations (GDPR & PSD2).	
6.	The API standard should enable a secure data exchange between the ASPSP and the TPP, mitigating the risk for any misdirection of communication to other parties.	
7.	The API standard (including any definition of data structures) should conform to (widely used) standard(s) issued by international or European standardisation organisations.	API EG expects that implementation of the standard does not create obstacles.
8.	The API standard should be built in such a way to allow the measurement of the API performance.	

**Annex V: List of key topics to be clarified**

N°	Topic	Assigned Members
1	Redirection vs other authentication methods (note: should be about what 'good' looks like from the point of view of the PSU)	E. Johansson G. Boudewijn K. Korus O. Berglund R. Ohlhausen
2	AIS data (what data is in scope?)	A. Mac Dowell J. Burkovic M. van Berkel
3	Access to payment account information by AISPS (4 times a day; 90-day period SCA)	J. Burkovic
4	Consent in scope of PSD2 in the context of the GDPR	EC input  G. Boudewijn to share EBF's legal analysis on the topic of consent
5	Who applies SCA? (what are the consequences)	A. Mac Dowell G. Boudewijn J. Burkovic K. Korus R. Ohlhausen
6	The "what" question	J. Whittle O. Berglund
7	Security	To be confirmed