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Summary of the 13th Meeting of the API Evaluation Group

30 July 2018, 10h30-17h00 CEST
EPC, Cours Saint-Michel 30A, 1040 Brussels
(Approved by the API EG Members)

1. Welcome

Co-Chair J. Whittle (NPSO Ltd) welcomed the participants to the thirteenth meeting of the API Evaluation Group (EG). Please see Annex I for the list of attendees.

The other co-Chair O. Berglund due to a delayed flight arrived late.

2. Approval of the agenda (API EG 037-18)

Having noted that no representatives of EBF and ESBG were able to join, J. Whittle stressed that the members present of the API EG should make every effort to agree on a revised Recommended Functionalities document today and that those who were absent should take a position on it after the meeting.
After some discussion including on the usefulness of having the meeting in view of some apologies the agenda was approved.

3. Updates from the EC, EBA and ECB

The European Commission (EC) representatives informed the API EG about a recent meeting between EC Vice-President Dombrovskis and EBF (with participation of one of the other ECSAs) of which the main highlights are as follows:
- Vice-President Dombrovskis stated that he would be happy to unblock the current situation in support of harmonised APIs;
- EBF stressed the need to focus for readiness for "day 1" and what is necessary for banks to put in place to fulfil the conditions for exemption under PSD2 (payment accounts only);
- EBF acknowledged that - access to non-payment account-related information being outside this perimeter – TPPs may wish to continue access to those accounts on the basis of "screen scraping" but that this would be governed by GDPR.
- EBF stressed that banks are fully committed to comply with PSD 2 and to implement the RTS and are investing heavily in developing well-functioning API's to make PSD 2 works.

The EBA representatives updated the API EG on a few recent developments:
- a public hearing on the draft Guidelines on the conditions to be met to benefit from an exemption from contingency measures under Article 33(6) of Regulation (EU) 2018/389 took place on 25 July; there were some 65 participants who expressed a variety of views in particular on KPIs (Key Performance Indicators)

and stress testing; it was reminded that only the written input in response to the public consultation will be taken into account by the EBA;

- the EBA invited TPPs to a "TPPs-only" meeting which about 35 TPP representatives attended and proved to be an enriching session at which the EBA learned things that they had to date not yet realised; it also emerged that TPPs had a diversity of views and concerns about the main issues at stake; the experience with Open Banking in the UK and the importance of conformance testing for both TPPs and ASPSPs were among the key topics raised.

In response to a comment from a TPP representative that TPPs will have to bear the onboarding costs related to hundreds of different APIs, an EBA representatives stressed that the current situation was the outcome of a conscious decision by the EBA to balance three objectives (i.e. Single Market, innovation and technology/business model-neutrality) which left room to the market for how to develop APIs.

The ECB representative reminded the API EG of the outcome of the 18 June 2018 ERPB meeting where the additional (and last) report of the ERPB working group on PIS was endorsed leaving it to the market to follow up on its business and operational recommendations.

4. Review of the Recommended Functionalities

The EACB representative made a preliminary remark that she was not mandated to speak on behalf of the other ECSAs who could not attend this meeting.

Against the background of the clarifications provided by the EBA last June and the recent iterations which the Recommended Functionalities document underwent, the following main points were expressed by meeting participants:

- J. Whittle submitted that the focus should now be on providing guidance to ASPSPs for their implementations as the recommendations to the API initiatives was effectively a completed task; the aim should be to avoid diversity in these individual implementations whilst enabling TPPs to continue to operate under the legal framework; the API EG should not re-open the discussion about the legal requirements; compelling evidence about what is needed to be supported by APIs should be provided as market-facing commentary;
- A TPP representative stressed that what was still missing is an agreement on what is needed for an API to ensure a viable PIS and AIS which goes beyond the "bare bones"; there was no agreement on the interpretation of what the law requires, which should not be the task of the API EG anyway; there was a common interest between ASPSPs and TPPs for APIs to be flexible; a proper classification is needed distinguishing within the Recommended Functionalities between what is agreed that ASPSPs have to implement and what TPPs additionally desire;
- An EC representative stated that legal requirements are not the API EG's role and that the API EG should focus on what should enable APIs to meet the 'no obstacle" and "widely used" conditions of the final RTS, which are legal requirements, even when defined in a general manner;
- An EBA representative made it very clear that there was no point of discussing about the legal requirements as these had been laid down for good with the exception of the above-mentioned EBA Guidelines which could still be further clarified based on the outcome of the ongoing public consultation; the API EG should establish the minimum list of recommended functionalities that have to

- be provided by ASPSPs as part of their implementation; his view was that API initiatives will comply with the Recommended Functionalities document notably due to the presence of public authorities as observers in the API EG;
- The ASPSP representative stressed the important added value already delivered by the group (i.e. help EBA in identifying outstanding issues that needed clarification), that the work of the API EG has been closely monitored and was perceived to be useful by her constituency but that time was of the essence as implementation was already well underway and that, for several of her members testing was becoming the more relevant issue to discuss. She also stressed that what was clarified by the EBA (such as redirect, data to PISP, payment execution, SCA by TPP) should no longer be re-discussed. Additionally, she requested that the group continued the work started in the last conference call and work on defining the 3 different categories of requirements. In any case a clear distinction was needed between what was mandatory and what was optional to avoid any perception that the whole list was mandatory. She supported the suggestion from EC to make it clear that some requirements could be fulfilled under commercial agreements;
- It was recognised by the API EG that ASPSPs should consider all recommended functionalities, and that what is outside the legal framework of PSD2/RTS could be agreed as a result of market facing agreements;
- An EBA representative reminded the API EG not to lose sight of the overarching need for a good customer outcome.

After some discussion on the categories of recommended functionalities, and a break to consult among the TPP representatives, the API EG agreed to review the latest version of the Recommended Functionalities document as shared by the TPPs the week before and apply the following classification:

- "bucket 1": Recommended Functionalities to be supported by API initiatives;
- "bucket 2": Recommended Functionalities desired by TPPs to be supported by ASPSPs;
- with "bucket 2" being a sub-set of the comprehensive "bucket 1".

That classification exercise was agreed to be summarised by the two co-Chairs.

It was also agreed to keep the first column of the table and to add a third column explaining the rationale/market commentary beyond each "bucket 2" classification (including the possibility for come functionalities to be offered under commercial agreements).

The group then reviewed the document up to requirement 17 on page 4.

What information is necessary for PIS in case the ASPSP is processing in batches was discussed. The EBA representative provided clarification on the 'yes/no' answer and the balance by explaining very clearly that it would depend on what the customer sees in its interface. The API EG agreed to split the recommended functionality.

A discussion ensued on account information services and the need to renew the exemption from having to apply SCA every 90 days. On this point, AISPs discussed the possibility to take care of this renewal in a practical way, so as to avoid that a user would have to do this for all their payment accounts (and savings accounts), especially if this would need to be done via redirection to all their ASPSPs. EBA said that as a matter of principle, TPP credentials are not for accessing an ASPSP account but that he

requirement was well understood, and further work was needed to understand how this requirement would align with the RTS. The EBA appreciated the practical consequences and invited the AISPs to provide further information on this. The EACB representative stressed that any delegation of the SCA to a third party would have to be considered as outsourcing of an important function (EBA outsourcing rules) and would need to be subject to an agreement with the party to whom the SCA would be outsourced to.

5. Approach to review the APIs

It was confirmed that the goal remained to invite some ASPSPs to present their API implementation in presence of the relevant API initiatives if so desired. Strict confidentiality and an open and constructive dialogue were agreed to be two indispensable conditions underpinning such an exercise. Upon a suggestion made by the ECB representative it was also agreed to include one multi-country retail bank in the list of ASPSPs to be approached.

6. Approach to testing

The differences between self-certification and conformance testing was discussed. Harmonisation in this area was seen as helpful.

7. Summary and next steps

The two Co-Chairs will finalise the revised Recommended Functionalities document following the approach agreed upon at the meeting and share it with the API EG within a week. A conference call may be convened before the next physical meeting to review the new draft. It was agreed that the document should be agreed at the latest at the next face-to-face meeting of the API EG (i.e. on 3 September 2018).

8. AOB

No other business was raised.

9. Next meeting dates

The next face-to-face meeting was confirmed to take place on 3 September 2018 from 10:30am to 5:00pm CEST in Brussels (EPC premises).

10. Closure of meeting

The Co-Chairs closed the meeting at approximately 16h50 CEST and thanked the participants for the constructive meeting.

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)	Apologies
	Emil Johansson	Swedbank (representing ESBG)	Apologies
PSU Members	Jean Allix	BEUC	Apologies
	Just Hasselaar	Ecommerce Europe	
	Pascal Spittler	IKEA (representing EuroCommerce)	Yes
Other Members	Thaer Sabri	EMA	Yes
	Krzysztof Korus	EPIF	
Observers	Ralf Jacob	European Commission	Yes
	Philippe Pellé	European Commission	Yes
	Krzysztof Zurek	European Commission	Yes
	Dirk Haubrich	EBA	Yes
	Nilixa Devlukia	EBA	Yes
	Helene Oger-Zaher	EBA	Yes
	Iddo de Jong[1]	ECB	Yes
Linking pin with technical experts	Arturo G. Mac Dowell	Eurobits	Yes
Guest	Lorenzo Gaston	Gemalto (Convenor ISO TC 68 / SC2 / SG1 TPP)	Apologies
Secretariat	Etienne Goosse	EPC	Yes
	Christophe Godefroi	EPC	Apologies

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[1] Alternate to Ann Börestam

Annex II: Action points of the 13th meeting of the API EG

Item	Action	Owner	Status / Deadline
13-01	Update the list of recommended API functionalities	Co-Chairs	6 August 2018
13-02	Enlist ASPSPs to present their API implementations	James Whittle	3 September 2018

Annex III Meeting Calendar

2018	API EG Meetings
January	**29 January 2018 (11:00-16:00 CET)** EPC, Brussels
February	**22 February 2018 (10:00-12:00 CET)** Conference call
	27 February 2018 (13:30–18:00 CET) – preceded by lunch as from 12:45 CET EPC, Brussels
	28 February 2018 (9:00-10.30 CET) **28 February 2018 (11:00-16:00 CET) API Evaluation Workshop with 5 API initiatives** EBF, Brussels
March	**27 March 2018 (09:00-17:00 CEST)** Brussels – EPC
April	**12 April 2018 (10.00-11.00 CEST)** - Conference call **23 April 2018 (10.30-17.00 CEST)** - EPC, Brussels
May	**14 May 2018 (10.30-18.00 CEST)** - EPC, Brussels **24 May 2018 (11.00-12.00 CEST)** – Conference call with API initiatives
June	**8 June 2018 (10.30-17.00 CEST)** – Hotel Warwick, Brussels **25 June 2018 (10:30-17:00 CEST)** – EPC, Brussels
July	**11 July 2018 (11:00-13:00 CEST)** – Conference call **30 July 2018 (10:30-17:00 CEST)** – EPC, Brussels
August	**Conference call ? - To be confirmed**
September	**3 September 2018 (10:30-17:00 CEST)** – EPC, Brussels **24 September 2018 (10:30-17:00 CEST)** – EPC, Brussels