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Summary of the 22nd Meeting of the API Evaluation Group

Conference call via Skype on 30 October 2018, 10h30-12h00 CET
(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 twenty-second meeting of the API Evaluation Group (EG) which was held as a conference call. Please see Annex I for the list of attendees.

J. Whittle informed that the main purpose of this conference call would be to agree on the proposed 'frozen' version of the baselined draft recommended functionalities in order to allow the ECSAs to initiate their internal approval process and then to be able to send a copy of this document to the national competent authorities (NCAs) as per their request.

2. Review of the recommended functionalities

The following two versions of the draft recommended functionalities had been provided to the API EG prior to the meeting:

- a. A version including the input received – in relation to column 1 (see Annex IV) - from four API initiatives¹ (APIIs)
- b. A proposed 'frozen' version – prepared by the API EG co-Chairs - of the baselined draft recommended functionalities in which the input from the four APIIs was consolidated via a 'heat map'.

In relation to version b, the API EG agreed that in addition to the heat map a type of weighting should be included in order to indicate for each functionality the number of APIIs that are able to support it.

Next, the API EG discussed the 'frozen' version of the recommended functionalities. The following comments and conclusions were noted:

- The API EG agreed that functionalities related to recurring card transactions could be removed as not in scope of the API (the API nevertheless needs to support card-based payment instrument issuers). In this context it was acknowledged that the setup for standing orders (by account servicing payment service providers) and recurring card transactions (by merchants' acquirers) is different.
- Following the suggestion of a TPP member it was agreed that for recommended functionality (RF) "Should enable a technical solution to support communication between an ASPSP and an AISP, PISP or CBPII regarding who does SCA", column 2 should say "In the process of clarification by the EBA" instead of "N" given it relates to the 90-days RF above that is so labelled.

¹ Berlin Group, Open Banking UK, Polish API Initiative & STET.

- It was agreed that in relation to RF “Should allow for the payee for a PISP-initiated payment to be added to the trusted beneficiary list as part of the PIS flow” the second column should say “N” instead of “in the process of clarification by the EBA” given the related question in the EBA Q&A tool has been published. The EBA clarified that it could be done via a contract.

A TPP representative asked what options exist in case one does not agree with the clarification provided via the EBA Q&A tool. The EBA representative replied that the Q&A tool provides clarification of the legal requirements, that are agreed by NCAs, and that if industry participants are of the view that such requirements should be changed, they should provide such information in the context of the review of the RTS. Alternatively, this could be considered within the negotiation of level-1 text.

The EBA was invited to inform the group on the publication of Q&As related to the work of the API EG and in particular those linked to pending issues in the list of recommended functionalities.

J. Whittle reiterated that the next step is to prepare an updated version of the recommended functionalities based on today’s comments which will be sent to the API EG for review in order to be able to approve it at the 8 November 2018 API EG meeting. This step would be paramount given that this document would then be provided to the NCAs (via the EBA) and also as it would serve as input to the anticipated meeting with the European Commission’s (EC) Vice President (VP) which is expected to take place on 29 November 2018. In view of the fact that not all recommended functionalities are supported by the five APIIs (which will in turn impact the firms that are using these specifications) the API EG should carefully consider the impact of the document on the market and think about the best way forward.

The EC as well as the EBA representatives were of the view that in order to give visibility to this work it would be desirable to publish the RF document before the anticipated meeting with the EC’s VP.

A TPP representative was concerned about the fact that when APIIs see a “N” in column 2 they might think that this means they are not required to support this functionality. He hence suggested to include in such cases that in their view not supporting the functionality may result in the creation of obstacles.

Different views were noted on whether or not something would need to be published prior to the meeting with the EC’s VP. An ECSA representative commented that creating a more high-level version of the document would be more meaningful for the discussion with the EC’s VP.

The co-Chairs were in favour of publishing a guidance document in due course as it would provide much needed guidance to the market and would give legitimacy to the anticipated meeting with the EC’s VP.

3. Summary and next steps

J. Whittle summarised that it was clear that a lot of work had been done since the creation of the API EG and that the API EG should publish a guidance document as initially planned. There is still an open question on what the most effective way forward would be i.e. should the document be published as is or should a type of overlay document be created instead. The goal would be to take this decision as a group at the

8 November 2018 API EG meeting. Also, sensitivity is required in relation to the fact that this publication will have repercussions. He continued by saying that the API EG had concurred with the fact that sharing the recommended functionalities document with the NCAs would be a logical step forward and that it would not benefit the API EG if it would not be able to publish a guidance document as input to the anticipated meeting with the EC's VP.

The API EG co-Chairs will prepare some headline inputs for the meeting with the EC's VP which inter alia should cover the achievements of the API EG as well as recommendations to address some of the API EG's concerns. Moreover, as the API EG has now concrete evidence about the fact that it could be difficult to achieve a successful ending in the timeframe that is left, it should equally prepare some suggestions on how to address this.

It was confirmed that an updated version of the recommended functionalities based on today's discussion will be provided to the API EG as input to the 8 November meeting of the API EG.

4. Closure of the meeting

The co-Chairs closed the meeting around 12h00 CET and thanked the participants for the constructive meeting.

Annex I: List of attendees

Category	Name	Institution	Attendance
Co-Chairs	James Whittle	Pay.UK	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
	Sébastien de Brouwer ²	EBF	Yes
	Diederik Bruggink ³	ESBG	Yes (until 11:30)
PSU Members	Jean Allix	BEUC	Apologies
	Juliette Beaulaton ⁴	Ecommerce Europe	Yes
	Pascal Spittler	IKEA (representing EuroCommerce)	
Other Members	Thaer Sabri	EMA	Yes
	Peter Cornforth	Paysafe (representing EPIF)	Yes
Observers	Ralf Jacob	European Commission	
	Remo Croci	European Commission	Yes
	Helene Oger-Zaher	EBA	Yes
Linking pin with technical experts	Arturo G. Mac Dowell	Eurobits	Yes
Guest	Lorenzo Gaston	Gemalto (Convenor ISO TC 68 / SC2 / SG1 TPP)	
Secretariat	Etienne Goosse	EPC	Yes
	Christophe Godefroi	EPC	Yes

² Alternate to Gijs Boudewijn

³ Alternate to Emil Johansson

⁴ Alternate to Just Hasselaar

Annex II: Action points of the 22nd meeting of the API EG

Item	Action	Owner	Status / Deadline
22-1	Provide to the API EG an updated version of the recommended functionalities	API EG co-Chairs EPC secretariat	31 October 2018
22-02	Prepare some headlines points for the meeting with the EC's Vice President	API EG co-Chairs	8 November 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 18 July 2018 (11:00-13:00 CEST) – Conference call 30 July 2018 (10:30-17:00 CEST) – EPC, Brussels
August	24 August 2018 (12:00-14:00 CEST) – Conference call 28 August 2018 (15:00-17:00 CEST) – Conference call 31 August 2018 (11:00-13:00 CEST) – Conference call
September	3 September 2018 (10:30-17:00 CEST) – EPC, Brussels 18 September 2018 (15.30-17:00 CEST) – Conference call 24 September 2018 (10:30-17:00 CEST) – EPC, Brussels
October	3 October 2018 (10:00-17:00 CEST) – EPC, Brussels 11 October 2018 (14:00-15:30 CEST) – Conference call with API initiatives 30 October 2018 (10:30-12:00 CET) – Conference call
November	8 November 2018 (10:00-17:00) – Sheraton Brussels Airport

Annex IV: Recommended functionalities header (based on version 9 November 2018 which was published on the EPC website)

EBA Opinion Table 1 Main requirements	Relevant articles	0. Recommended Functionality description	1. Common recommendation to be supported by API initiatives to achieve cross market consistency and harmonisation between specs (y = Yes should be supported)	2. Functionalities specific to ASPSPs seeking to meet the conditions for an exemption (Y = Yes should be implemented as explicitly legally required and as such to meet the conditions for an exemption / N = Not explicitly required to meet the conditions for an exemption but relevant to good market facing outcomes	3. Market facing commentary to inform considerations for implementing a good API for customers (specific comments attributed to ECSAs = European Credit Sector Associations (EBF, ESG, EACB), BEUC = the European Consumer Organisation, TPPs = AISP and PISP providers, Retailers = EuroCommerce and Ecommerce Europe)