

SPAA MSG 005-21

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Approved

Minutes of the 'kick-off' meeting of the SEPA Payment Account Access Multi-Stakeholder Group (SPAA MSG)

Venue: Microsoft Teams meeting

Distribution: SPAA MSG

Meeting Date: 6 October 2021 (10.00-13:00 CEST)

1 Welcome and introduction

The co-chair A. González Mac Dowell (Tink, representing asset brokers¹) welcomed the members to the 'kick-off' meeting of the SEPA Payment Account Access Multi-Stakeholder Group (SPAA MSG) and informed that co-chair C. Schäfer (Deutsche Bank (supported by the three ECSAs), representing asset holders) was unfortunately unable to join due to being on sick leave. He welcomed the great turnout - in particular in view of the short meeting notice - which is a good indication of the market interest in this topic.

The EPC secretariat apologised for the short meeting notice and explained the reasons behind it.

This meeting marks the start of the preparatory phase ('phase 0') during which the SPAA MSG will be invited to agree on the scheme's concrete scope and prioritised requirements for approval by the Board at its 24 November 2021 meeting and pave the way for the start of 'phase 1', which is expected to start in December 2021 (subject to the final Board decision in relation to the invitation by the Euro Retail Payments Board (ERPb) on taking up the role of SPAA scheme manager).

Following an invitation by the co-chair, G. Boudewijn – as asset holder² representative – addressed the strategic importance of open banking in the payments space (but also for other sectors). The co-chair agreed with the strategic importance and highlighted that the SPAA MSG as an industry based approach should aim to maximise the potential of PSD2 (and beyond) and ensure a fair distribution of value and risk between the different actors.

Please see Annex I for the list of attendees.

2 Approval of the agenda (SPAA MSG 003-21)

¹ The entity that uses assets (e.g. data) from the asset holder, with permission of the asset owner, to deliver value to the end users. Value is being driven by either consumer or corporate demand. In the context of PSD2, a TPP would be an asset broker.

² The entity that holds the assets. An asset holder is not necessarily the same entity as the data owner. In the context of PSD2 an asset holder would be an ASPSP.



The agenda was approved unchanged.

3 Notification of EPC policy documents (EPC212-14; Pres EPC058-21; EPC024-18; EPC071-20)

The SPAA MSG members were informed about the main stipulations in the EPC Competition Law Code of Conduct, EPC Data Protection and Privacy Policy and EPC Document Classification Rules.

In particular it was highlighted that the members of the SPAA MSG should not discuss anything related to commercially sensitive topics and as a matter of principle refrain from processing any personal data accessed or obtained through their SPAA MSG membership for any purpose not directly related to the SPAA MSG itself.

In relation to the different EPC document classifications (i.e. public; internal use; confidential; strictest confidential) it was clarified that most SPAA MSG documents are expected to be labelled as “internal use” documents which means that the SPAA MSG members can also share them within their constituencies.

The SPAA MSG members were invited to carefully read these policy documents and to inform the EPC secretariat in case of any further questions.

4 Notification of the approved SPAA MSG Terms of Reference and the 2021 Report of the ERPB Working Group on a SEPA API Access Scheme (EPC166-21; ERPB/2021/005)

The SPAA MSG terms of reference (ToR) were approved by the Board at its 29 September 2021 meeting and the different sections such as mission and objective, scope, deliverables and group composition were clarified by the co-chair.

The co-chair moreover explained that the expectation is to develop a SPAA scheme related to payment accounts, subject to the Board - at its 24 November 2021 meeting - accepting the ERPB’s invitation to take up the role of SPAA scheme manager. The role of the SPAA MSG is however not to interpret the law i.e. the legal and regulatory requirements of PSD2 constitute the ‘baseline’ and the aim is to go beyond such baseline to encompass value-added (‘premium’) services that may be provided in the context of ‘open banking’ as a natural evolution of PSD2. The requirements defined in the June 2021 report of the ERPB Working Group on a SEPA API Access Scheme (ERPB WG API) will be used as a guideline for this work.

The SPAA MSG’s composition reflects a fair and balanced representation of the different stakeholders. In this context it was noted that the seats available to SMEUnited and EuroCommerce have not yet been filled as the respective organisations were unable to nominate a representative at this point in time.

The SPAA MSG was informed that the following minor updates had been included in the final approved version of the ToR compared to the version that was published initially in support of the call for SPAA MSG candidates:

- Inclusion of an explicit reference to the preparatory ‘phase 0’.
- Inclusion of a definition for “standards”.
- Clarification regarding the fact that the co-chairs can come either from within the respective contingent of asset holders and asset brokers or from the European associations that represent a specific category of PSPs and are members of the ERPB, whilst satisfying the same requirement that the co-chairs represent asset holders and asset brokers respectively.

The co-chair provided a summary which covered the history behind the creation of the ERPB WG API (including the different phases), as well as its organisation (including six subgroups) and main



focus points. In particular the following two recommendations - which were endorsed by the ERPB - were highlighted:

- Implement a Scheme for the payment asset class, i.e. move the payment asset class from discussion into a delivery phase (including the invitation to the EPC to take up the role of scheme manager related to payment accounts).
- Explore the implementation for financial asset classes beyond payments and frame the ecosystem for asset classes beyond finance (including the need to identify a host for a multi-stakeholder project for financial asset classes beyond payments).

Following a question from M. Van Mello it was clarified that the SPAA MSG will indeed focus on payments only but that in line with the above ERPB WG API recommendation there is a parallel objective to find a host for the extension to other financial asset classes and ultimately beyond finance.

The co-chair added that there is currently still some ambiguity in relation to what is considered to be a payment account. For example a savings account is not considered a payment account in all member states. This is something the SPAA MSG will need to take into account when progressing its work and hence he advised to start with an as wide as possible interpretation. H. Fürstenau informed that it will be important to find a common EU based approach whereby a win-win scenario can be ensured both for the asset holders and asset brokers and added that the German market has built an open API scheme, called “giroAPI”, which is expected to be put in production soon and which also goes beyond payments. The co-chair suggested to add this topic to the agenda of one of the next SPAA MSG meetings in order to better understand the German approach.

G. Boudewijn reported on a recent discussion with the Dutch central bank from which he had understood that the European Commission (EC) - in the context of its Open Data policy - is debating whether the provision of (payment related) data should be for free. J. Weits took note of the comment and informed that she would further discuss this internally. The co-chair shared this concern and added that a free (i.e. what is covered by the law can still be delivered for free) and a paid (i.e. for ‘premium’ services) approach could co-exist. In this context, he added that PSD2 and RTS are in some cases very complicated to interpret and that there is hence a strong incentive for asset brokers to find a ‘clear’ way of obtaining information and for this they would (in his view) be willing to pay. He furthermore suggested to invite the EC to provide a status update on this matter at the next SPAA MSG meeting. H. Fürstenau added that it should be highlighted to the EC that business cases are indeed needed for both the asset holders and asset brokers.

5 Status report on the 29 September 2021 meeting of the (EPC) Board in relation to the SPAA MSG

The co-chair, as a recent Board member, reported the following on the 29 September 2021 Board meeting:

- The establishment of the SPAA MSG and hence the launch of the preparatory ‘phase 0’ was confirmed.
- The SPAA MSG’s terms of reference were approved.
- The composition of the SPAA MSG (including its two co-chairs) was confirmed.
- Decision was taken to postpone the final response to the ERPB’s invitation until its 24 November 2021 meeting (and this response is to be verbally conveyed to the ERPB at its 25 November 2021 meeting).
- Agreement was reached that the acceptance of the ERPB’s invitation would inter alia be conditional upon the outcome of ‘phase 0’, providing the Board with the necessary clarity



regarding the scope ('perimeter') of the future SPAA scheme as well as on reaching an agreement of a 2022 funding model. To this end, an extra-ordinary meeting was scheduled to take place on 22 October 2021.

E. Goosse confirmed the above report and added that SPAA is a rather novel project for the EPC with inter alia reputational, financial and legal risks that need to be mitigated. In view of this, the Board is taking its due time to carefully consider all the necessary aspects and implications. Moreover, clarity on the scope and prioritisation is essential in order to be able to publish a rulebook in November 2022 that addresses the key market needs (subject to Board approval).

6 Clarification of the scope and key requirements of the SPAA Scheme (SPAA MSG 002-21)

A draft document had been prepared by the SPAA MSG secretariat which provides an overview of the prioritised customer journeys (CJ) and related business requirements (BR) as described in the 2021 report of the ERPB WG API. It was highlighted that the aim of this exercise was to help define the scope of the anticipated SPAA scheme and that it had been elaborated with the purpose of facilitating an initial discussion with the SPAA MSG.

The co-chair reiterated that the objective of the preparatory 'phase 0' is to clarify the perimeter of the SPAA scheme and as such the aim would be to work towards a final agreed version of this document by the November 2021 meeting of the Board.

Following a question from T. Sabri it was clarified that the ERPB WG API report is to be used as a guideline and although its content is not 'cast in stone' the MSG should refrain from making too many changes. T. Sabri informed that he was referring to a number of topics which could help in the domain of fraud risk mitigation.

Following a question received from J. Weits it was noted that as a first step the aim would be to ensure as much as possible clarity whereas the level of detail required could be looked at as a next step. Moreover, a suggestion from A. Coggerino was taken on board in relation to the possibility to group some of the CJs and BRs.

The SPAA MSG started with a preliminary review of the document and the following comments were noted:

- Item 3 - CJ - Personal Finance Management (PFM) automated transfers:
 - Since a payment account is involved it was agreed to keep it in scope of the scheme. This use case should be open to mobile as well as to browser based solutions.
- Item 4 - CJ - Pay-by-link:
 - R. Ohlhausen clarified that in this use case, the Payer will for example receive a message via a social media message app and by clicking on the received link a payment can be initiated which may or may not include an SCA step (via the Payee's ASPSP or not).
 - H. Robache commented that this is rather a customer related topic and H. Muus was of the view that this topic would not be in scope.
 - J. Weits added – as a general remark - that some items on the list already have local implementations.
 - The SPAA MSG will have to decide later whether this topic is in scope and whether the impact is applicational or transactional.
- Item 5 - CJ - Payments to multiple counterparties:
 - Following a discussion on whether 'batch' payments can be online or offline only it was suggested to rather refer to the term 'bulk' payments. In general, the



terminology and related definitions used in the document will need to be further updated and agreed by the SPAA MSG.

- H. Robache informed that the so-called 'signing baskets' as referred to in the Berlin Group's XS2A Framework can contain other things beside payments.
- T. Sabri questioned who would govern the division of a marketplace payment to several parties. H. Muus explained that the division of the payment can be governed by the service. T. Sabri commented that a TPP could not do this as it can only instruct but not receive the payments. It was however noted that if a payment instruction is going to the TPP (in its role of PISP), the TPP might offer - as a service - to divide this payment.
- The co-chair questioned whether it is a valid customer journey and whether there is a need for a specific BR.
- P. Spittler informed that for the CJ 'Single payment to multiple counterparties' the marketplace is the payee.
- Item 6 - CJ - Payment with unknown final amount:
 - It was clarified that this would be related to one payment only and that in contrast to CJ #1 'Future dated payments', the payment could also be aborted.
 - J. Sarilho commented that the real value related to this CJ is the reservation of funds. H. Muus highlighted the legal requirement of knowing the final amount when making the payment. R. Ohlhausen however commented that a similar set-up exists for credit cards and hence this use case should also be feasible from a legal perspective for credit transfers. The co-chair commented that reservation of funds would rather be a BR (and not a CJ).
 - P. Spittler stressed the need to ensure a seamless customer experience which can be obtained via reservation of funds and charging the customer at the end of the process with the final amount.
- Item 7 - CJ - Personal loan application:
 - The co-chair explained that this topic is in scope, taking into account that the transactional payment related information of the PSU could be used for the scoring process of the loan application.
- Item 10 - CJ - SCA:
 - It was clarified that not all SCA methods can be made mandatory. R. Ohlhausen added that the ERPB WG API conclusion had been to at least not make the delegated SCA method mandatory, and that the idea is to have the best possible journey by ensuring the maximum use of exemptions whenever legally feasible.
- Item 13 - BR - Standardisation of QR codes
 - It was agreed that this topic is out of scope as the Multi-Stakeholder Group on Mobile initiated SCT (instant) (MSG MSCT) is expected to develop a standardised QR code by November 2021. It is to be noted that 'out of scope' does not mean that it is not a business requirement as such, it just means it is not in scope of the future SPAA scheme.
- Item 14 - BR - Proxies at a European level for bank identifiers.
 - The topic was considered out of scope in view of the existing SEPA Proxy Lookup (SPL) scheme.
- Item 15 - BR - Request to Pay (RTP):
 - It was agreed that the topic is out of scope in view of the existence of the SEPA Request to Pay (SRTP) scheme as well as other RTP related schemes.
- Item 20 - BR - Identification of user (PSU)



- A TPP could for example use the service of an asset holder to validate certain PSU information.

The co-chair summarised that the aim would be to validate the way the CJs and BRs are framed and ensure that the related content is clear, correct and complete. To this end, the SPAA MSG members were invited to review the document (both CJs and BRs) and to provide their comments and/or additions to the EPC secretariat by 19 October 2021 cob. It was noted that in case additional CR or BJ are suggested, complete information would need to be provided (i.e. the different columns are to be completed in the table).

7 Approval of the SPAA Scheme development plan (including priorities and key milestones) (SPAA MSG 004- 21)

A first draft version of the SPAA scheme development project schedule had been shared with the SPAA MSG members prior to the meeting. As a first step, the focus is on the following work items covered under preparatory ‘phase 0’ which will need to be delivered by November 2021:

- Agreement on the SPAA scheme's concrete scope, key requirements and priorities.
- Preparation by the EPC’s legal adviser of a preliminary competition law analysis and risk assessment, including a holistic review of the scope of the “PSD2-baseline”, to ensure that the scheme is developed within the appropriate framework of reference

A report on the conclusion of ‘phase 0’ will need to be provided to the 24 November 2021 meeting of the Board (two weeks in advance) as well as to the 25 November 2021 meeting of the ERPB (three weeks in advance). To this end it was noted that the 27 October 2021 meeting will be a critical one to ensure a timely delivery.

8 Approval of the 2021 meeting calendar (SPAA MSG 001-21)

The SPAA MSG agreed to schedule a virtual meeting on 27 October 2021 and 3 December 2021. A Doodle poll will be created to agree on the November 2021 meeting date.

9 Planned communication activities

To ensure transparency the EPC will publish on its website the SPAA MSG’s terms of reference, membership list and approved agendas and minutes. No objections were received in relation to the publication of the membership list which contains the names of all the members.

In addition, following a request from the Board, the two co-chairs agreed to prepare a so-called ‘elevator pitch’ to be used by the different constituencies (and beyond) in order to help frame and “sell” the project. This topic will be further discussed at the next meeting of the SPAA MSG.

10 AOB

No other topics were discussed.

11 Closure of meeting

The co-Chair closed the meeting at around 13.00 CEST and thanked again the members for attending this meeting at such a short notice.



Annex I: List of attendees

Country	Name	Institution	Attendance
Co-Chairs			
EU	Arturo González Mac Dowell	Tink	Yes
DE	Christian Schaefer	Deutsche Bank (supported by the three ECSAs)	Apologies
Members			
AT	Hendrik Muus	PSA	Yes
DE	Caroline Jenke	FinTecSystems GmbH	Yes
DE	Christian Wenz	PPI AG	Yes
DE	Hartwig Gerhartinger	Paysafe Group	Apologies
DE	Hermann Fürstenau	Association of German Public Banks (VÖB) (nominated by GBIC)	Yes
EU	Alessia Benevelli	ESBG	Yes
EU	Gijs Boudewijn	EBF	Yes
EU	Jasper De Meyer	BEUC	Yes
EU	Krzysztof Korus	EPIF	Yes
EU	Marieke Van Berkel	EACB	Apologies
EU	Massimo Battistella	EACT	Yes
EU	Michel Van Mello	EuroCommerce	Yes ³
EU	Ralf Ohlhausen	ETPPA	Yes
EU	Tarik Zerkti	PRETA S.A.S.	Apologies
EU	Thaer Sabri	EMA	Yes
FI	Suvi Rautakorpi	Finance Finland	Apologies
FR	Fanny Rodriguez	Bankin' and Bridge	Yes
FR	Gildas Le Louarn	Linxo	Yes

³ Pascal Spittler joined as alternate to cover M. Van Mello when offline.



FR	Géraldine Debost	Crédit Agricole S.A. (nominated by the French banking community)	Yes
FR	Hervé Robache	STET (nominated by the French banking community)	Yes
IE	Jack Wilson	TrueLayer	Yes
IT	Alessio Castelli	CBI S.c.p.a.	Yes
IT	Andrea Coggerino	Intesa Sanpaolo (nominated by ABI)	Yes
NL	Daniel Morgan	Plaid	Yes
NL	Rob van Bergen	ING (nominated by the Dutch Payments Association)	Yes
PT	João Sarilho	SIBS (nominated by Association of Portuguese Banks)	Yes
SE	Jens Olsson	Trustly	Yes
	Observers		
EU	Julia Weits	European Commission	Yes
EU	Kerstin Junius	European Central Bank	Yes
	EPC Secretariat		
	Christophe Godefroi		Yes
	Etienne Goosse		Yes
	Silvia Di Lillo		Yes ⁴

⁴ Only for agenda item 3 'EPC Policy documents'.



Annex II: Action points

Ref.	Action	Owner	Status/Target
01-01	Create an updated draft version of the document “Overview of business requirements and customer journeys”, including some editorial updates as well as a first attempt to group a number of customer journeys and business requirements	SPAA MSG secretariat	6 October 2021
01-02	Create a Doodle poll for the November 2021 meeting	SPAA MSG secretariat	6 October 2021
01-03	Indicate availability for the November 2021 meeting	SPAA MSG Members	11 October 2021
01-04	Include following topic to the agenda of the 27 October 2021 meeting: <ul style="list-style-type: none"> - Status update on the activities of the EC in the open data / open finance space 	Co-chairs SPAA MSG secretariat	13 October 2021
01-05	The topic of German “giroAPI” to be put on the agenda of one of the future SPAA MSG meetings	Co-chairs	27 October 2021