



SPAA MSG 014-22

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Approved

## Minutes of the ninth meeting of the SEPA Payment Account Access Multi-Stakeholder Group (SPAA MSG)

**Venue:** Microsoft Teams meeting

**Distribution:** SPAA MSG

**Meeting Date:** 22 April 2022 (10.00-16:00 CEST)

### 1 Welcome by the SPAA MSG co-chairs

The co-chairs A. González Mac Dowell and C. Schäfer welcomed the members to the ninth meeting of the SEPA Payment Account Access Multi-Stakeholder Group (SPAA MSG).

The co-chairs informed that the objective would be to send the draft public consultation version of the SPAA scheme rulebook to the Board on 4 May 2022 and hence urged the members to raise any substantial comments they would have as early as possible during the meeting. They also informed that the Legal Support Group (LSG) had scheduled a dedicated meeting on Tuesday 26 April 2022 to review a number of rulebook related topics such as eligibility and obligations of the scheme participants.

It was also communicated that the production of the minutes of today's meeting as well as of the 25 March 2022 meeting will be delayed in order to be able to prioritise the finalisation of the draft public consultation version of the SPAA scheme rulebook.

Please see Annex I for the list of attendees.

### 2 Approval of the agenda (SPAA MSG 010-22)

The proposed agenda was approved unchanged<sup>1</sup>.

### 3 Status update on latest developments

The co-chairs provided a status update on the following outstanding action points:

- Planning of a follow-up meeting with the chair of the RTP Task Force (TF) to discuss the status of the SPAA MSG's change request in relation to the 'SEPA Request to Pay' (SRTP) scheme.
- Progressing the understanding of due diligence/AML requirements for asset brokers in view of a recent decision by the Swedish financial supervisory authority. For this purpose,

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<sup>1</sup> The order of agenda items 5 and 6 was however reversed.



the co-chairs are planning to reach out to DG-FISMA and other stakeholders. Several members informed that they wished to be involved in the preparatory process.

#### **4 Report on the activities of the SPAA Business Conditions Work Block and the SPAA API Work Block (and its subgroups) (SPAA BC WB 007-22; SPAA BC WB 011-22; SPAA BC WB 012-22)**

The draft minutes of the first and second meeting of the SPAA Business Conditions (BC) Work Block (WB) had been provided for information to the SPAA MSG members.

The following updates were noted:

- **SPAA BC WB:** Following the publication on 22 March 2022 of the Request for Proposal (RfP) to find an economic consultant for the definition of a possible business model for the SPAA scheme, various questions had been received from interested parties and the related Q&A document had also been published on the EPC website. The RfP response deadline was set on 22 April 2022 cob and the SPAA BC WB is expected to start assessing in an anonymous manner the received proposals at its 3 May 2022 meeting.

Following a question from H. Fürstenau, it was clarified that the RfP does not refer to “API access fees” as yet as discussions regarding this matter were still ongoing at the time the RfP was published. This topic will however be clarified to the selected candidate.

The SPAA MSG approved the replacement of the Trustly representative in the SPAA BC WB (i.e. J. Kjellin Rosendal will be replaced by R. Wandhöfer (ETPPA)).

- **SPAA API WB:** To further accelerate the work, two dedicated workstreams had been created i.e. the transactional asset subgroup (led by C. Schäfer) and the data asset subgroup (led by A. González Mac Dowell). In the last two weeks, these subgroups had held many meetings in order to be able to complete their task. It was communicated that the SPAA API WB had recommended to remove the data assets ‘IBAN validation’ and ‘Payer Identification’ from the draft public consultation version of the rulebook, as the information to perform both services could be obtained via other data assets (e.g. via the asset ‘list of payment accounts’). It was noted that there were some discrepancies between the minimum viable product (MVP) assessment document (see also section 6) and the rulebook in view of the fact that the rulebook had further developed since the creation of the MVP document.

The co-chairs expressed their appreciation for the achievements of the work blocks and subgroups.

#### **5 Final review of the updated draft version of the SPAA scheme rulebook, prior to submission to the 18 May 2022 Board for approval (EPC012-22; SPAA MSG 011-22)**

The SPAA MSG reviewed an updated draft version of the SPAA scheme rulebook which also included the comments received in writing from H. Fürstenau prior to today’s meeting, as well as comments resulting from the 19 April 2022 meeting of the SPAA API WB and 21 April 2022 meeting with the Module 3 and SPAA Scheme Interest Group participants. The main discussions are summarised as follows:

- **Section 1.2 “Actors”:** It was agreed - in order to keep things simple - to stick with the definitions that are used in the ERPB WG SEPA API Access Scheme Report. The suggestion of H. Fürstenau to include a sentence regarding the need for an asset broker to periodically perform



KYC of the asset user (merchant) was not supported<sup>2</sup>. Initially it was suggested to cover this topic under the obligations section of the rulebook, but this was in the end not deemed necessary as legal obligations of each actor should be taken for granted. Fraud mitigation related matters will however be tackled in the risk management annex.

- **Section 1.4 “Currency”**: E. Goosse drew attention to the deviation on the application of euro in the SPAA scheme rulebook vis-à-vis the other SEPA scheme rulebooks, in which the use of euro is set as a minimum. He added that if the description of currency would remain as is, the Board would need to be informed accordingly. The ECB representative commented that a scheme participant from a non-euro country should in principle not be allowed to decline a euro transaction and this was also the view of E. Goosse. It was reiterated that the initial reason to make euro optional was to ensure the take up of the scheme in non-euro countries. The ECB representative suggested some updated wording to clarify that i) euro would not be mandatory for domestic transactions between scheme participants in a non-euro country and ii) these scheme participants should however not refuse the use of the euro if the asset owner and asset user have agreed on this currency for a specific transaction.
- **Section 1.8 “Business benefits of the scheme”**: H. Fürstenau informed that he had not found any reference to the principle of ‘fair distribution of value and risk’ in the minutes of the SPAA BC WB. He added that the SPAA BC WB does not seem to “collect the market prices (values)” and that these values must be “estimated” in order to ensure the aforementioned fair distribution. It was concluded that this topic is to be discussed by the SPAA BC WB.
- **Chapter 2 “Business and operational model”**: Under ‘process steps’ it is noted that “the detailed specification of each API interaction is not provided by this rulebook as they rely on each API implementation and related architectural choices such as the detailed sequence of requests/responses”. H. Fürstenau questioned whether the process steps were sufficiently described as well as their compatibility with the API standard his constituency is using. H. Robache explained that the idea has always been to have one common view and added that the API standardisation initiatives can choose how they want to (technically) implement the high-level process steps defined in the rulebook. It was furthermore agreed to clarify under ‘attributes’ that besides the data elements defined in the rulebook, the inclusion of “reasonable additional technical data elements” would be up to each API implementation. It is however to be avoided that this would lead to interoperability issues.
- **Section 2.1.1. “Generic processing flow”**: The SPAA MSG agreed to rename the four ‘process levels’. For example, “Request execution” is to be renamed “Execution request (by the asset broker to the asset holder)”. In addition, the word “initiation” - used in the process steps description under this level - is to be replaced by “execution”. The other process levels will be renamed in a similar fashion. It was moreover agreed that the process flow related to a cancellation initiated by the asset owner or asset holder could be de-scoped from the first version of the SPAA scheme rulebook.
- **Section 2.1.2 “ Core requirements/Service endpoints”**: “Trade name of the final payee” can be included as an optional attribute in the relevant transactional asset datasets.

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<sup>2</sup> This suggestion also referred to the fact that the asset broker i) should ensure that the permission of the asset owner is verifiable and ii) is liable for fraud.



- **Section 2.1.2.2.1. “DS-05 Future dated payments warehoused with defined execution date”:** Following a question it was reiterated that the terms ‘Payment guarantee’, ‘Reservation of funds’ and ‘Payment Enforcement Mechanism’ could have different implications in different member states. In order to come to a conclusion, a vote was organised and ‘Payment Certainty Mechanism’ (PCM) was the term that gathered the highest number of votes. This term will hence be used throughout the rulebook.
- **Section 2.1.2.2.1.3.2. “DS-07 Request Execution related to DS-05 Dataset”:** As DS-05 relates to the initiation of a single transaction future dated payment with defined execution date, it was agreed to remove the sentence “must the execution be done globally or for each payment transaction”.
- **Section 2.1.2.6. “Refunds”:** It was noted that the amount of the refund cap could differ from one business case to another. As a result, agreement was reached to remove the reference to a maximum cap of € 3,000. In addition, P. Spittler confirmed that the general practice is not to reimburse more than the original purchase price although exceptions may exist in e-commerce. Moreover, at the 21 April 2022 meeting with the Module 3 and SPAA Scheme Interest Group participants it had been questioned whether single refunds as well as batch refunds would be covered in the rulebook. The SPAA MSG agreed that batch refunds would not yet be covered in the first release of the SPAA scheme rulebook (see Annex III).
- **Section 2.1.3. “Premium features Datasets “:**
  - “DS-P01 Payment enforcement mechanism request Dataset” was renamed “Payment certainty mechanism request Dataset” (see above).
  - “DS-P02 Request for not applying transaction fees for the Payer Dataset“:
    - H. Fürstenau informed that his constituency requests the removal of this feature as the fees charged by the asset holders and asset brokers to their respective customers is out of scope of the SPAA scheme. He continued by saying that this feature was not part of ERPB WG report.
    - Co-chair C. Schäfer informed that this topic had been discussed in the asset holder’s mirror group and that the joint view was to remove it from the first release in view of the following:
      - It would impact the commercial relationship between the asset holder and its customers and as such would raise PSD2-related and competition law concerns.
      - There are also concerns about the implementation complexity and related costs.
    - G. Boudewijn confirmed that for the time being the inclusion of this feature in the first release of the rulebook would be considered a ‘red flag’ for the asset holders.
    - Co-chair A. González Mac Dowell informed that the asset brokers’ view is that not including this feature would have a major impact on the success of the scheme as no other successful payment instrument has transaction fees directly applied to the payer. He moreover added that during the 21 April 2022 meeting with the Module 3 and Interest Group participants a poll had been organised - to gauge the views about the level of demand and complexity in relation to the assets and related premium features - and that this feature was ranked as one of the easiest to implement. Finally, he suggested to have a conversation with the EC to see how this



- could be accommodated and whether it is compatible with the current law (or if potentially a 'change suggestion' would be needed in view of an upcoming PSD3).
- It was agreed that for regular credit transfers such as SCT there should be no impact as in principle no specific fees are applied for regular credit transfers (as opposed to instant credit transfers). In addition, a legislation on instant payments is expected to be proposed around September 2022 by the EC regulating among other things pricing principles, which may provide for some form of alignment between regular and instant credit transfers.
  - R. Ohlhausen commented that he failed to understand the concerns of the asset holders as what is discussed is merely a fee transfer mechanism, which does not interfere with any regulatory stipulations related to fees. (i.e. the asset broker will 'absorb' the fee and decide whether to pass it on partially or wholly to the asset user (e.g., the merchant)).
  - G. Boudewijn reiterated that the asset holders' side is currently not comfortable with this topic, and that more time would be needed to assess it (including from a legal point of view). He furthermore clarified that this discomfort is from a technical / commercial / legal nature and not related to the fact that the topic was not included in the ERPB WG report. Following a comment, he also suggested not to link this feature to the topic of default remuneration fee, which is clearly in scope of the SPAA scheme (whereas consumers' fees are not).
  - R. Ohlhausen commented that as this is a key-feature for the asset brokers he could not agree with removing it from the rulebook. He added that he however did not have an issue with giving more time to do a legal assessment.
  - P. Spittler informed that there is market need and that it would indeed make sense to include it in the rulebook.
  - It was commented that this feature was included in the SPAA scheme's scope (resulting from 'phase 0'), which had been approved by the Board.
  - Co-chair A. González Mac Dowell wondered whether it would be an option to set up a type of 'gentleman's agreement' in relation to this topic.
  - Co-chair C. Schäfer concluded that the legal/regulatory concern is twofold: i) can a transfer mechanism be permitted in a SPAA scheme context (to be potentially discussed with DG-FISMA) and ii) anti-trust related concerns on the side of the asset holders (to be potentially discussed with DG-COMP).
  - T. Sabri commented that a formal process would be required (including the preparation of a position paper) prior to reaching out to the EC.
  - Co-chair A. González Mac Dowell clarified that the question should be whether it is possible from a legal point of view to introduce a transfer mechanism (of a per-transaction fee) to the asset broker/ asset user (e.g. merchant).
  - G. Boudewijn reiterated that the LSG would discuss this topic at its next meeting and that if the LSG would come to a conclusion there might be no need to reach out to DG-FISMA.
  - The SPAA MSG agreed that i) the outcome of the 26 April 2022 LSG meeting on this matter would be shared with the SPAA MSG and ii) the SPAA BC WB as well as the external EPC legal counsel would be consulted before reaching out to DG-COMP.



- T. Sabri questioned what the situation would be in relation to this topic in case the customer (of the asset broker) would be a payer. It was noted that this had not yet been discussed and that it would be too late to add new functionalities.
  - Co-chair C. Schäfer suggested to come to a conclusion on the following proposed steps after the lunch break<sup>3</sup> and added that if no agreement could be reached, it would be up to the Board to make a decision:
    - LSG to explore the legal concerns.
    - Asset holders to further investigate the possible implications.
    - Market developments to be further observed in order to decide how relevant this feature is.
    - Removal of this feature from the first version of the SPAA scheme rulebook
  - The SPAA MSG was however unable to reach a consensus on the inclusion of “DS-P02 Request for not applying transaction fees for the Payer Dataset” in the rulebook and as a result the Board at its 18 May 2022 meeting will be invited to make a decision. To this end, it was agreed that the arguments against and in favour of including this feature in the first version of the rulebook would need to be provided to the Board.
- “DS-P05 Request to not suppress SCA exemption Dataset”: This feature was renamed “DS-P05 Request to not apply SCA exemption Dataset”. For clarification purposes, it was also agreed to include an example of an asset broker initiating a small-amount payment (i.e. an SCA exemption use case) who explicitly requests the asset holder not to apply this exemption and to hence process a full SCA of the asset owner.
- **Section 2.2 “Data assets”**: For a number of topics further LSG review is required. For example, in relation to attribute “AT-XX 90 (180) SCA exemption” it is to be confirmed whether it could be agreed between an asset holder and asset broker that a consent renewal is not needed.
  - **Section 2.2.3.5 “SCA exemptions and delegations implemented”**: It is to be clarified in the rulebook that the asset holder should apply all the available SCA exemptions unless the asset owner had opted out.
  - **Section 4.3 “Eligibility Criteria”**:
    - Following a question from H. Fürstenau on how to deal with scheme participants from the UK and Switzerland, E. Goosse assured that the matter would be looked at (this is also covered in the other SEPA scheme rulebooks).
    - Next, the Co-chairs presented a draft document they had prepared which outlines for each of the transactional and data assets (included in the rulebook) whether a PIS and/or AIS licence would be required. The following comments were noted:
      - R. Ohlhausen commented that a possibility should be foreseen in the scheme to make account information available based on a PIS license. He moreover added that he was not sure that an (additional) AIS license would be required for one-off payments with supporting account information.
      - T. Sabri asked whether electric money institutions had been considered and whether the e-money directive would have any relevance. G. Boudewijn informed that this will be looked at by the LSG.

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<sup>3</sup> To give members some extra time to think about it and also taking into account the fact that a couple of members were not present when this proposal was made.



- I. de Jong informed that for regular PIS and AIS an eIDAS certificate provider will check whether an entity has the required license(s) at the time of issuance.
- G. Boudewijn commented that the first question should always be “are you allowed to provide the respective service?”.
- Co-chair C. Schäfer concluded that i) the LSG will be invited to review the eligibility table, ii) the table is to be restructured in a modular way (regulated versus non-regulated entities) and iii) an extra column “(additional) scheme specific eligibility criteria” is to be included. This work can be done during the public consultation period.
- Co-chair A. González Mac Dowell commented that for the initial phase a scheme participant would probably need to be a licensed entity (could be PIS or AIS). S. De Lillo however informed that in the SRTP scheme non-regulated entities can also become scheme participants. It is to be looked at whether regulatory requirements can be extended to non-regulated entities and to what extent. In the context of the SRTP scheme, an independent homologation body (mandated by the EPC) is doing the accreditation of the applicants to the scheme. She continued by saying that some requirements might be needed for security reasons and informed of the feedback from the EU authorities regarding the fact that unnecessary barriers should not be created if they do not exist on a legal level.
- It was concluded that i) the scheme should be ‘inclusive’, ii) for transaction assets most likely a PIS license will be needed and for data assets an AIS license and iii) the feasibility of bundling services is to be looked at from a legal point of view.
- The SPAA MSG reviewed the list of main comments and questions received during the 21 April 2022 SPAA scheme status update meeting with the Module 3 and SPAA Scheme Interest Group participants, and provided its answers (see Annex III).
- Having completed the review of the draft rulebook, co-chair C. Schäfer asked the SPAA MSG whether there were any ‘showstoppers’ and if not whether the public consultation version of the rulebook could be sent for approval to the Board. The following additional feedback was received:
  - H. Fürstenau commented that the available time to review the latest version of the draft rulebook was rather limited and he hence expected that further comments would be submitted by his constituency during the public consultation.
  - R. Ohlhausen suggested that the EPC Board could be asked to endorse the inclusion of this feature for the consultation, together with appropriate legal caveats, but could not simply decide against it. Asset Brokers see this as a show stopper and it would not make sense to run a consultation without it.
  - T. Sabri was of the view that some areas such as related to liability and breaches require further work. G. Boudewijn however informed that these sections are ‘standardised’ modules that are covered in all EPC scheme rulebooks. H. Fürstenau shared the view of T. Sabri and added that in the case of the SPAA scheme, the standardised approach might not be sufficient as it is more “open and free”.

As no objections were received, co-chair C. Schäfer concluded that the public consultation version of the SPAA scheme rulebook could be submitted with confidence to the Board, subject to the pending LSG review.



## **6 Update on the road to a 'Minimum Viable Product (MVP)' – including on the outcome of the complexity/demand assessment (SPAA MSG 009-22)**

For each of the assets (transactional and data) covered in the draft rulebook, the MVP complexity/demand assessment gives an initial high-level assessment ('snapshot') of the complexity to implement it for the asset holders versus the level of demand by the asset brokers.

The co-chairs informed that they had taken the lead within their respective constituencies in order to generate an aggregated asset brokers' / asset holders' view. The summer period will be used to further progress the understanding of the asset brokers and asset holders, in order to progress from this initial 'snapshot' towards a more quantitative assessment. P. Spittler was also invited to share the input from the merchants' side by September 2022.

As a concrete outcome of the initial assessment it was noted that there is high demand for one-off payments and future dated payments and that the complexity to implement these assets is deemed to be low.

It was agreed that the initial MVP assessment (and related 'heat maps') should be shared for information with the Board, subject to updating some of the terms in line with the SPAA MSG decisions taken during today's meeting.

## **7 Next steps (SPAA MSG 012-21; SPAA MSG 004-21)**

The placeholder meeting initially foreseen for 25 April 2022 will be rescheduled to 27 April 2022 (9-10 CEST) and whether or not this meeting will be needed will depend on the outcome of the 26 April 2022 meeting of the LSG.

It was also agreed to schedule an additional SPAA MSG meeting on 17 June 2022 (13-16 CEST).

## **8 AOB**

No other topics were discussed.

## **9 Closure of meeting**

The co-chairs thanked the SPAA MSG members, the WB members and the secretariat for their commitment and valuable contributions. They felt proud of what the group has achieved, hoped that the constructive work can be continued and that the respective constituencies can be mobilised to get involved in the SPAA Scheme.



## Annex I: List of attendees

Country	Name	Institution	Attendance
<b>Co-Chairs</b>			
EU	Arturo González Mac Dowell	Tink	Yes
DE	Christian Schaefer	Deutsche Bank	Yes
<b>Members</b>			
AT	Hendrik Muus	PSA	Yes
DE	Dennis Dorfmeister	FinTecSystems GmbH	Yes
DE	Christian Wenz	PPI AG	Yes
DE	Hartwig Gerhartinger	Paysafe Group	Yes
DE	Hermann Fürstenau	Association of German Public Banks (VAB)	Yes
EU	Alessia Benevelli	ESBG	Yes
EU	Gijs Boudewijn	EBF	Yes
EU	Bryan Coughlan	BEUC	Apologies
EU	Krzysztof Korus	EPIF	Yes
EU	Farid Aliyev <sup>4</sup>	EACB	Yes
EU	Massimo Battistella	EACT	Yes
EU	Pascal Spittler <sup>5</sup>	EuroCommerce	Yes
EU	Ralf Ohlhausen	ETPPA	Yes
EU	Tarik Zerkti	PRETA S.A.S.	Yes
EU	Thaer Sabri	EMA	Yes
FI	Suvi Rautakorpi	Finance Finland	Yes
FR	Fanny Rodriguez	Bankin' and Bridge	Yes
FR	Gildas Le Louarn	Linxo	Apologies
FR	Géraldine Debost	Crédit Agricole S.A.	Yes
FR	Hervé Robache	STET	Yes
IE	Jack Wilson	TrueLayer	Apologies
IT	Alessandro Impellizzeri <sup>6</sup>	CBI S.c.p.a.	Yes

<sup>4</sup> Alternate of Marieke van Berkel

<sup>5</sup> Alternate of Michel Van Mello

<sup>6</sup> Alternate of Alessio Castelli



IT	Marco Altamura <sup>7</sup>	Intesa Sanpaolo	Yes
NL	Daniel Morgan	Plaid	Yes
NL	Rob van Bergen	ING	Yes
PT	João Sarilho	SIBS	Yes
SE	Oscar Berglund	Trustly	Yes
	<b>Observers</b>		
EU	Julia Weits	European Commission	Yes
EU	Iddo de Jong <sup>8</sup>	European Central Bank	Yes
	<b>EPC Secretariat</b>		
	Christophe Godefroi		Yes
	Etienne Goosse		Yes
	Silvia Di Lillo		Yes
	Jenny Huang		Yes

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<sup>7</sup> Alternate of Andrea Cogerino

<sup>8</sup> Replacing Kerstin Junius



## Annex II: Action points

Ref.	Action	Owner	Status/Target
09-01	Scheduling meeting with the RTP TF chair for following up the SPAA MSG change request related to the SRTP scheme	SPAA MSG co-chairs/ secretariat	5 May 2022
09-02	Scheduling meeting with DG-FISMA to progress the understanding of due diligence/AML requirements for asset brokers in view of a recent decision by the Swedish financial supervisory authority.	SPAA MSG co-chairs/ secretariat	25 April 2022
09-03	Incorporating the LSG's legal review into the rulebook and sharing the related background information with the SPAA MSG	SPAA MSG secretariat	28 April 2022
09-04	Finalising the public consultation version of the SPAA scheme rulebook for Board approval	SPAA MSG secretariat	04 May 2022
09-05	Sharing the Module 3 / Interest Group poll results and updated Q&A with the SPAA MSG members	SPAA MSG secretariat	07 May 2022
09-06	Mailing out the updated Heat Map & MVP assessment to the SPAA MSG members	SPAA MSG secretariat	28 April 2022
09-07	Rescheduling the SPAA MSG placeholder meeting to 27/04/2022	SPAA MSG secretariat	22 April 2022
09-08	Sending an Outlook invitation for an additional SPAA MSG meeting on 17/06/2022	SPAA MSG secretariat	07 May 2022
09-09	Progress the initial 'snapshot' MVP assessment towards a more quantitative assessment.	SPAA MSG co-chairs	20 September 2022
09-10	Providing an updated 'merchants' position in relation to the demand column of the MVP demand/complexity assessment table	P. Spittler	20 September 2022



## Annex III: SPAA scheme – Input received from Module 3 and Interest Group participants

### 1. Background

This documents lists the main comments and questions received during the 21 April 2022 SPAA scheme status update meeting with the Module 3 and SPAA Scheme Interest Group participants.

This input was discussed at the 22 April 2022 meeting of the SPAA MSG, and the resulting responses have been included in section 2.

### 2. Input received

- What about liability in case a payment enforcement mechanism<sup>9</sup> has been provided by the Asset Holder and the payment is not executed (but goods have been sent)?
  - *SPAA MSG: This topic is to be covered in the ‘obligations’ section of the draft SPAA scheme rulebook.*
- Suggestion to rename “Payment without transaction fees for the Payer” to for example “Payment with transaction fees not borne by the Payer”. Moreover, it is to be clarified that there is a contractual relationship and Article 62 (2) (related to the sharing of charges) of PSD2 is also to be taken into account.
  - *SPAA MSG: The inclusion of this topic in the draft SPAA scheme rulebook is to be decided by the Board. The rewording suggestion was however approved by the SPAA MSG.*
- Anything related to consumer fees should not be included in the rulebook (anti-trust concerns).
  - *SPAA MSG: This topic is to be decided by the Board.*
- In relation to a ‘provisional payment’ it should be very clear what exact information is to be provided by the Asset Holder.
  - *SPAA MSG: The term ‘provisional payment’ will be replaced by ‘payment with supporting account information’. The market can provide further feedback during the anticipated public consultation.*
- Are single refunds as well as batch refunds (i.e. collection of refunds at the end of a day) covered under the refunds section in the SPAA scheme rulebook?
  - *SPAA MSG: Batch refunds will not yet be covered in the first release of the SPAA scheme rulebook.*
- For list of payment account transactions, it is to be clarified what types of transactions are covered (e.g. historical, expected, ...). Also, the reference to “as available online” might not always be relevant. The suggestion is to ask feedback from the market during the public consultation.

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<sup>9</sup> Renamed ‘Payment Certainty Mechanism’.



- *SPAA MSG: The dataset related to payment account transactions will list the different applicable attributes. The market can provide further feedback during the anticipated public consultation.*
- Are credit conditions covered under data asset 'cards'?
  - *SPAA MSG: The attribute 'credit conditions' will be added to the dataset related to cards.*
- SCA exemptions might be seen as confidential information and hence some Asset Holders might prefer to share this information via an API instead of a directory service.
  - *SPAA MSG: This topic is to be reviewed by the future Risk Work Block.*
- The functionalities need to be clear to the market. There should be no uncertainties as this could have an impact on the success of the scheme.
  - *SPAA MSG: The SPAA MSG agrees and is of the view that the functionalities are sufficiently clear. The market can however highlight any uncertainties during the anticipated public consultation.*
- Clear governance rules are needed in relation to a situation whereby a participant is unable to 'deliver' what the rulebook prescribes.
  - *SPAA MSG: A compliance mechanism is foreseen in the SPAA scheme rulebook (like in all other EPC SEPA scheme rulebooks).*
- The rulebook does not yet cover a proposal in relation to a certification/homologation process.
  - *SPAA MSG: A placeholder is foreseen (Annex III) in the draft SPAA scheme rulebook but further work is indeed still needed.*