



SPAA MSG 005-24

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European Payments Council AISBL,
Cours Saint-Michel 30 B-1040 Brussels
T +32 2 733 35 33
Enterprise N°0873.268.927
secretariat@epc-cep.eu

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Approved

Minutes of the SPAA Scheme Piloting Workshop

Venue: EPC, Cours Saint-Michel 30A, 1040 Brussels

Distribution: SPAA MSG; Module 3 and SPAA Scheme Interest Group participants

Meeting Date: 28 February 2024 (10.00-16:00 CET)

1 Welcome and introduction

The EPC Director General, Giorgio Andreoli and the SEPA Payment Account Access Multi-Stakeholder Group (SPAA MSG) co-chairs A. González Mac Dowell and G. Boudewijn welcomed the participants to the SPAA scheme piloting workshop.

A roll-call was initiated to allow the participants to introduce themselves.

The list of attendees can be found in Annex I.

2 EPC Competition Law Code of Conduct – Meeting guidelines (Pres EPC058-21)

The EPC legal counsel presented compliance guidelines in relation to the EPC Competition Law Code of Conduct. The slides will be distributed after the meeting for information to the workshop participants.

3 Introduction to the SPAA scheme (Pres EPC007-24)

The SPAA MSG co-chairs provided a brief recap on the main characteristics of the SPAA scheme. The introduction slide deck will be shared with the workshop participants after the meeting.

4 The potential of the SPAA scheme

The PwC representatives - M. Folcia, A. Pratz and P. Gusmerini - provided a presentation on “Assessing the potential of the SPAA scheme”. The presentation which will be shared with the workshop participants covers the following topics:

- Open Banking in Europe is yet to achieve its full potential.
- SPAA has the potential to solve the main pain points that have hampered growth in Open Banking.
- Premium assets and premium features as covered in the SPAA scheme rulebook can create value for end users and scheme participants.
- The potential of SPAA across Europe can be assessed through three dimensions to prioritize the countries to launch a pilot phase.
- Based on international experiences PwC learned that suitable use cases and trust are key elements to drive the adoption.



PwC moreover reported that end-users are mostly unaware that they are using Open Banking solutions and that changing payment behaviour takes time. G. Boskovich informed that in the UK, Open Banking is provided as the first payment method option for tax payments (HM Revenue & Customs) and that it has been a great success. R. Ohlhausen added that the key focus should be on the merchants as they will want to use the solution that is best for their customers.

PwC also informed that they are planning to conduct a survey towards a sample of asset brokers - via a 'black box' approach - in order to reassess data asset volume projections (used for the calculation of version 1.0 of the Default Fees) in view of potential traffic flowing via direct access versus dedicated interfaces. Asset brokers interested in participating in this survey were invited to register themselves via the QR code that is included in PwC's slide deck.

5 Piloting approach (Pres EPC029-24)

A slide deck was presented by the SPAA MSG co-chairs which focuses on the following topics :

- Why do we need a pilot?
- What are the main piloting characteristics and key piloting principles?
- How to establish of a 'collation of the willing'?

As to why a pilot would be required (as opposed to going live), co-chair G. Boudewijn clarified that although several important pieces of the puzzle have been put in place (such as the SPAA scheme rulebook, the Default Fees, first scheme participants from the asset broker side etc.) it still needs to be tested how they all fit together.

The main goal of today's brainstorming session would be to manage expectations and to present as a next step a number of preliminary conclusions in preparation of a concrete pilot phase.

K. Rasappan wondered what the consequences would be for the SPAA scheme in the case the pilot would not take off. He added that in his experience many asset holders are not yet aware of SPAA and hence more education would be required. He continued by saying that as a service provider, he could get in touch with asset holders to explain how he could support them. G. Boskovich suggested for the pilot to examine the need for additional support mechanisms.

G. Andreoli informed that it is not foreseen to certify or homologate service providers in the short-term and that the only 'validation' that is planned to take place at this stage is related to API standardisation initiatives and their implementation via self-assessment tools. In this context it was noted that the SPAA API Work Block will be responsible for the assessment of the functional compliance between the SPAA scheme rulebook and the API specifications developed by the API standardisation initiatives. Technical compliance between APIs implemented by SPAA scheme participants and API specifications developed by API standardisation initiatives could be evaluated based on compliance tools and procedures (e.g., API sandboxes and test-cases catalogues developed by these API initiatives). Moreover, subject to Board approval the EPC is expected to launch a 'call for interest' to identify European API standardisation initiatives that already developed or intend to develop API specifications compliant with the SPAA scheme rulebook. API Standardisation Initiatives that are responding to this 'call for interest' will be invited to provide evidence of conformance tools and procedures to facilitate an automated assessment / 'self-service' certification of asset holders and asset brokers.

As a next step, the group discussed the following piloting characteristics and key principles:

Should you already be a SPAA scheme participant to join a pilot?

It was agreed that in order to join the pilot, one would not need to be a scheme participant but there should at least be a clear intention to join the scheme.



Focus on transaction assets and/or data assets (in line with the MVPs defined in the rulebook)?

L. L. Hauge was of the view that for the pilot, the MVP should be further reduced. M. Kostro agreed that this would also be helpful for the asset holders.

C. Damen was also in favour of narrowing down the MVP for the pilot. He noted that in the UK the ASPSPs have implemented a Variable Recurring Payment (VRP) API, but there is no business model at present. On the other hand, in Europe no SPAA APIs have been implemented, but a business model already exists. To this end, he suggested that the pilot would focus only on the API for Dynamic Recurring Payments (DRP, which is the same as VRP) in view of its benefits for the merchants. R. Ohlhausen was however in favour of letting pilot participants choose which functionalities they would like to test in order to attract as many asset holders. He moreover pointed out that DRP is quite complex from an IT point of view and that the key use case for TPPs is a combination of a single payment with a payment guarantee. Co-chair A. González Mac Dowell agreed that it would be better to opt for simpler functionalities, which do not require additional investments. Another simpler test case would be premium Account Information Services (e.g., including savings accounts). K. Rasappan was in favour of introducing DRP during the pilot phase instead of focusing on the bare minimum as the technical impact for asset holders might not differ substantially. A. Cazacu confirmed that there is significant demand for DRP from UK and European markets as well as from vendors.

C. Damen informed that in the UK, the ASPSPs had to implement the VRP API within a 6 months to 1 year period. M. Kostro however commented that for most European ASPSPs to be able to implement DRP they would first need to migrate to version 2.0 of the Berlin Group's openFinance API Framework. This would entail significant changes regardless of whether it would be related to a pilot or a go-live scenario. He moreover informed that ASPSPs might have to migrate to version 2.0 anyway in view of PSR requirements. In this context, H. Fürstenau informed that the German solution, giroAPI, will be based on version 2.0.

P. Messelink commented that if functionalities would be limited, the pilot might not generate sufficient interest. He added that a sort of matrix document could be created via which the asset holders would be able to indicate the main reasons for participating in a pilot.

Pan-European and/or community-led approach?

The focus should be on a pan-European approach (given that SPAA is a pan-European scheme and the involvement of pan-European merchants).

Timeline and duration of pilot project(s)?

It was suggested to make a distinction between a tactical pilot phase (short term – for example one off payment in combination with a payment guarantee) and a strategic pilot phase (long term – for example covering DRP). Due to the fact that budget decisions (by ASPSPs) will only be taken in October 2024 it would not be feasible to start the strategic phase before the beginning of 2025. T. Sabri was of the view that a 'champion' would be needed to kick off the pilot and that a more involved approach would be required.

Definition of success criteria?

In N. Senechal's opinion, defining the key success criteria would be the most important component of the pilot project i.e. the main enablers of SPAA need to be identified first.

The version (v1.0 vs v2.0) of the openFinance API Framework was also seen as a success criteria given that the majority of asset holders would have to migrate to version 2.0 in order to be able to participate in the strategic pilot.



Co-chair G. Boudewijn wondered if it would make sense to first organise a survey to understand what could convince stakeholders to join the pilot.

Measurable input (e.g. conversation rate) and a balanced pilot membership (asset brokers, asset holders and merchants) were also considered to be important success criteria. In addition it was noted that both qualitative and quantitative criteria would be required. In response to a comment from G. Boskovich, co-chair A. González Mac Dowell explained that critical mass would not be required for simple functionalities.

K. Rasappan commented that a scope/market/product fit would be needed (in order to know that it works). To this end, it was questioned whether what the group is trying to achieve is i) a pilot, ii) a technical proof of concept or iii) a combination of the two. P. Spittler remarked that merchants or end-users would not need to be involved in a 'simple' technical pilot but if the aim is also the test the value of specific services/functionalities then they would however need to be part of the pilot. The co-chairs responded by saying that in essence an answer is needed to the question "can SPAA work?" and that the most relevant part would be to see whether and how it impacts the market. G. Boskovich wondered if the issue is rather commercial/business model related instead of technical, whether time and effort should be wasted on a technical pilot. Co-chair G. Boudewijn however commented that at this point in time we cannot yet be sure that there are no technical issues.

N. Senechal informed that there might also be an impact on the 'Terms and Conditions' (i.e., changes might have to be made). Moreover, he recommended that it should be considered how to convey the necessary level of 'confidence' to motivate participants to move to the next strategic pilot phase and what should be done in case this confidence is not achieved. A balance is hence required between technical and business-related success criteria. He continued by stating that in terms of adoption, conversation rates can be tested but wondered how for example attractiveness could be measured? Co-chair G. Boudewijn concurred and added that the question is therefore what 'matrix of success' will be used to measure this level of confidence (also taking into account that failure is not an option).

E. Choukroun was of the opinion that the attractiveness of the SPAA functionalities and the Default Fees are the two main success criteria. In her view there would be no need to focus on the technical part.

Co-chair G. Boudewijn suggested to look into the possibility of setting up a dedicated work block in charge of further defining the key success criteria.

SPAA Scheme Default Fees applicable during pilot phase?

R. Ohlhausen was of the view that the Default Fees could potentially be waived or even doubled if needed to attract more pilot participants. To this end, he asked whether asset holders would see any value in changing the Default Fees for the pilot phase. Co-chair G. Boudewijn replied by saying that only when we start using the Default Fees we will know whether they are accurate. Co-chair A. González Mac Dowell added that it would make sense to test whether the Default Fees are market compliant but then this would also mean that invoicing would be required. P. Messelink commented that as the Default Fees are known this would only be a theoretical matter (as you can multiply the Default Fees by the number of API requests). R. Ohlhausen however suggested to keep things simple for asset holders and as such it would be better to avoid the need to invoice. As an alternative, G. Boskovich commented that instead of applying Default Fees during the pilot, they could for example be charged after this phase has been completed.



Following a comment from E. Choukroun, co-chair G. Boudewijn explained that the SPAA Business Conditions Work Block is looking at a pragmatic and robust method for the recalibration of the Default Fees.

6 Next steps

The co-chairs summarised the main conclusions from today's workshop as follows:

1. Work is to be started on a tactical short-term pilot. It is to be defined what exactly this entails and it is to be analysed what is feasible versus desirable.
2. In parallel, in order to ensure that a maximum number of participants will join the strategic pilot in 2025, the SPAA MSG is to discuss the proposal of establishing a marketing work block to help further promote the SPAA scheme. A compelling storyline will need to be drafted to help convince the decision makers - in particular on the supply side - to foresee a budget for participation in the strategic pilot. In this context, it could for example be mentioned that in order to comply with PSR and FIDA, it is expected that the European asset holders that use the Berlin Group API specifications, will have to migrate to version 2.0 of openFinance API Framework anyway and that as a result the delta for SPAA would be minimal.

As a next step, the co-chairs might also reach out to a number of workshop participants to gather further ideas on how to move forward. A follow-up meeting with the workshop participants is expected to be scheduled in the near future.

K. Rasappan informed that he would be willing to prepare a survey in order to identify inter alia the markets and assets that could be included in a SPAA pilot.

7 AOB

No other topics were discussed.

8 Closure of meeting

The co-chairs thanked the workshop members for their valuable input and for the constructive discussions. The meeting was closed at around 15h30 CET.



Annex I: List of attendees

SPAA MSG

Country	Name	Institution	Attendance
Co-Chairs			
EU	Arturo González Mac Dowell	Supported by the three ENCSAs	Yes
EU	Gijs Boudewijn	Nominated by the three ECSAs	Yes
Members			
AT	Hendrik Muus	PSA	Yes
DE	Christian Wenz	PPI AG	Apologies
DE	Hartwig Gerhartinger	Paysafe Group	Apologies
DE	Hermann Fürstenau	Association of German Public Banks (VÖB)	Yes
EU	Helena Freitas	EPIF	Yes
EU	Farid Aliyev	EACB	Yes
EU	Massimo Battistella	EACT	Apologies
EU	Pascal Spittler	EuroCommerce	Yes (Teams)
EU	Ralf Ohlhausen	ETPPA	Yes
EU	Tarik Zerkti	PRETA S.A.S.	Yes
EU	Thaer Sabri	EMA	Yes
EU	Miriam Schütt	DSGV (nominated by ESBG)	Apologies
FR	Fanny Rodriguez	Fintecture (nominated by Bridge)	Apologies
FR	Gildas Le Louarn	Linxo	Apologies
FR	Géraldine Debost	Crédit Agricole S.A.	Yes
IE	Andrei Cazacu Anna Kelly	TrueLayer	Yes
IT	Alessandro Impellizeri Alessio Castelli	CBI S.c.p.a.	Yes Yes (Teams)
NL	Martijn Bos	Plaid	Apologies
NL	Maciej Kostro Donovan Hendry	ING (nominated by DPA)	Yes Yes (Teams)
PT	João Sarilho	SIBS	Yes
SE	Andreas Widegren	Nordea (nominated by the Swedish Bankers' Association)	Apologies



SE	Oscar Berglund	Trustly	Apologies
UK	Andrew Neeson	Tink	Yes
	Guests		
	Paolo Gusmerini	PwC	Yes (only for presentation)
	Marco Folcia	PwC	Yes (only for presentation)
	Andreas Pratz	PwC	Yes (only for presentation)
	EPC Secretariat		
	Christophe Godefroi		Yes
	Giorgio Andreoli		Yes
	Silvia Di Lillo		Yes (only for presentation)

Module 3 Participants

Country	Name	Institution	Attendance
AT	Philip Wachtler	Erste Bank Group AG	Yes (Via Teams)
BE	Jonathan Watteau	Febelfin	Yes
DK	Jarmo Heilakka	Danske Bank	Apologies
DK	Rasmus Engbæk Larsen	Finance Denmark	Apologies
EU	Marieke van Berkel	European Association of Co-operative Banks (EACB)	Apologies
EU	Charles Damen (Token.io) Robert Sullivan (Token.io) Nicole Green (Yapily) Wayne Jones (GoCardless)	Open Finance Association Europe (OFAE)	Yes Yes Yes (Via Teams) Yes (Via Teams)
EU	Thaer Sabri	Electronic Money Association (EMA)	Yes
EU	Loreta Liutkute Habchi	European Payment Institutions Federation aisbl (EPIF)	Apologies
EU	Ali-Ashraf Rajabli	European Savings & Retail Banking Group aisbl (ESBG)	Yes
EU	Sébastien de Brouwer	European Banking Federation (EBF)	Apologies
FI	Inkeri Tolvanen	Finance Finland	Apologies



FI	Hanna Äijälä	OP Corporate Bank plc (OP Financial Group)	Apologies
FR	Virginie Chazal	BFCM - Crédit Mutuel Group	Apologies
FR	Sophie Giorgi	Crédit Agricole	Apologies
FR	Eric Veronneau	BPCE	Yes
FR	Fanny Rodriguez	Perspecteev SAS	Apologies
FR	Philippe Evenot	La Banque Postale	Apologies
FR	Emmanuelle Choukroun	Société Générale	Yes (Via Teams)
FR	Frederique FAGES	BNP Paribas	Yes
DE	Axel Schindler	Bundersverband der Deutschen Volksbanken und Raiffeisenbanken (BVR)	Apologies
DE	Fabian Schuster Dang Anh Hai	Bundesverband deutscher Banken (BdB)	Yes (Via Teams) Yes (Via Teams)
DE	Florian Schmitz	Deutscher Sparkassen- und Giroverband (DSGV)	Yes (Via Teams)
DE	Gerald Kühn	DZ BANK AG	Apologies
GR	Vasilis Panagiotidis	Hellenic Bank Association	Apologies
IT	Cinzia Sippelli	Associazione Bancaria Italiana (ABI)	Apologies
IT	Marco Carletti	BFF Bank – BFF Banking Group	Yes
IT	Andrea Fusco	ICCREA Banca	Yes (Via Teams)
IT	Daniele Demuro	PostePay	Yes
IT	Luca Vanni	UniCredit Group	Yes (Via Teams)
LU	Bettina Helling	Luxembourg Bankers' Association (ABBL)	Yes
MT	Jean Paul Fabri	Insignia Cards Limited	Apologies
NO	Dag-Inge Flatraaker	DNB Bank	Apologies
PT	José Vicente	Association of Portuguese Banks	Apologies
RO	Luminita Soitu	Romanian Association of Banks	Apologies
ES	Raquel Barrado Sierra	Banco Bilbao Vizcaya Argentaria sa (BBVA)	Apologies
ES	Anna Puigoriol	Banco de Sabadell	Apologies
ES	Gomez Rey Horacio Santiago	Banco Santander	Apologies
ES	Xavier Herrero	CaixaBank	Yes



SE	Sara Edholm	Swedish Bankers' Association	Apologies
CH	Dieter Goerdten	UBS AG	Apologies
NL	Esther de Beurs	ABN Amro	Yes
NL	Marije Dekker	ING Bank	Apologies
NL	Michal Kalina	Rabobank	Yes (Via Teams)
UK	Ciaran Murtagh	CitiBank	Apologies
UK	Mariya Galhaut	HSBC	Apologies
UK	Rachel McMahon	National Westminster Bank plc	Apologies

SPAA Scheme Interest Group Participants

Country	Name	Institution	Attendance
DK	Lars Lolk Hauge	Mastercard	Yes
FR	Lauren Jones	Open Banking Europe	Apologies
FR	Hervé Sitruk	France Payments Forum	Apologies
FR	Paul Messelink	Worldline	Yes
DE	Michael Walla	Boku	Yes
IT	Massimiliano Fabani	Banca Popolare di Sondrio	Apologies
IT	Ivo Martinolli Hannes Lantschner	Raiffeisen Landesbank Südtirol AG	Yes (Via Teams) Yes (Via Teams)
IT	Bartolomeo Ruotolo	Fabrick	Yes
ES	Miguel Torres	Redsys Servicios de Procesamiento, S.L	Yes
UK	Ghela Boskovich	FDATA	Yes
UK	Kannan Rasappan	Banfico	Yes
UK	Nick Senechal	Visa	Yes