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Subject	National Implementation Support Platform NL (NISP-NL) for PSD2 dedicated interfaces	

Summary / action to be taken

- You have been informed through Members' Bulletins 18.030_LB and 18.031_LB about the planned coordination activities of Dutch Payments Association to support the smooth implementation of dedicated interfaces by ASPSPs, and ultimately help facilitate the granting of exemptions of the fall-back interface obligation by DNB. These activities are labelled 'National Implementation Support Platform NL' or NISP-NL.
- This Members' Bulletin is to inform you about the first meeting with stakeholders and DNB as an observer to discuss the process between now and 14 September 2019 when the dedicated interfaces have to be operational and 'wide usage' has been demonstrated.
- The meeting will take place on **Friday 14 December 13.00 – 17.00** in WTC Amsterdam Zuidas (conference centre, entrance Zuidplein).
- Please inform us **Wednesday 12 December COB** if you plan to participate in this meeting, including the names of the colleagues who will join the meeting.
- Please forward this Bulletin to the relevant colleague(s) within your organization.

Introduction NISP-NL

In the context of PSD2 and 'access-to-the-account', the European Banking Authority (EBA) and the Dutch Central Bank (DNB) are entrusted with special tasks with regard to 'dedicated interfaces', more specifically the granting of exemptions to ASPSPs of the fall back obligation. The EBA has published its Guidelines for the exemption handling process on December 4. As far as we know, members of the Dutch Payments Association base their dedicated interface on the NextGenPSD2 API framework of Berlin Group. For ASPSPs ('banks') implementing the NextGenPSD2 framework, a project has been set up under the heading 'NextGenPSD2 Implementation Support Project' (NISP). Both NextGenPSD2 and NISP have a pan-European scope. The Dutch Payments Association participates in NISP for the benefit of its members. Members of the Dutch Payments Association have expressed an additional need for local support as well.

Despite the application of a pan-European framework such as NextGenPSD2, national aspects play a role in the realisation of the dedicated interface. Moreover, it is at the discretion of the national competent authority (for NL: DNB) whether an exemption is granted to an ASPSP for the realisation of the fall-back interface. The requirement of 'wide usage' of an interface by market participants plays

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an important role here, in a three-month period between March and June 2019. This requirement calls for the early involvement of all relevant market parties in the interest of an efficient, inclusive and transparent process..

Following demand from the members, the Dutch Payments Association has decided to organize local coordination and support, aimed at the efficient and effective implementation of dedicated interfaces more specifically with the aim to help interested members increase their chances for the aforementioned exemption of a fall-back interface if they intend to request such exemption from DNB. In that context adequate involvement of and constructive dialogue with interested third party providers of the new PSD2 services which are the potential users of the dedicated interfaces is important. In addition to technical support, the Dutch Payments Association will establish and maintain the liaison with various stakeholders, including DNB, payment institutions and other relevant market parties.

It must be noted that the planned coordination and implementation support by our association in no way relieves individual ASPSPs of their legal responsibilities under PSD2 and more specifically the RTS on SCA and SCA, nor does in any way change their obligations towards DNB or other competent authorities under PSD2 (ACM, AFM and AP). Also, the planned coordination efforts do not change the role of the National Forum on the Payment System (MOB), specifically its Working Group on Harmonisation of Access to the Payment Account and Working Group on Efficiency and European affairs (WEE).

First stakeholder meeting

During the first stakeholder meeting we would like to discuss the following topics each with a brief introduction:

- Stakeholder landscape for XS2A
- API Evaluation Group Recommended Functionalities
- Aspects of 'wide usage'
- Testing approach period Mar-Sep 2019
- Wrap-up / next steps

Invited participants will be from banks, payment institutions, interested third party providers of the new PSD2 services and fintech; with DNB as an observer.

Activities of NISP-NL

The activities as foreseen consist of a combination of analysis and reporting activities; ad-hoc communication with members and external parties; and regular work meetings with the XS2A Expert Group of the Payments Association. In more detail:

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- Technical support in the application of the results of NextGenPSD2 and NISP: where necessary specification of the results to the Dutch context; point of contact and source of information; feedback of relevant cases to NextGenPSD2 and NISP.
- Consultation and dialogue with DNB about the process to be followed in the period March / June / September 2019.
- Consultation of other relevant stakeholders - payment institutions / consumers / entrepreneurs - on topics that affect the dedicated interface.
- Early issue spotting and referring issues to relevant other fora, where applicable (*it must be noted that competition law has to be respected at all times and that commercial issues cannot be discussed*).