

Stakeholder meeting NISP-NL

National Implementation Support Project

Amsterdam
14 December 2018

Agenda

13.00 Welcome & introduction [Gijs]

- History & overview
- API Evaluation Group
- Stakeholder landscape

13.30 NCA perspective – context & scoping [Evert]

- Supervisory process timelines
- MOB WG “Toegang tot de betaalrekening”
- EBA Guidelines - high-lights / post-consultation changes

14.00 TPP perspective [Maurice]

- API review
- SCA exemptions
- Market expectations

14.30 ASPSP perspective [Max]

- NextGenPSD2 API framework
- NextGenPSD2 Implementation Support Project

14.45 Break

15.15 Implementation perspective [Max]

- National Implementation Support Platform (NISP-NL)

15.45 Participant input + discussion [Betaalvereniging]

16.45 Next steps & closing [Gijs]

Situation in NL – Gijs Boudewijn

Act

- Dutch Senate ('Eerste Kamer') approved the Dutch Implementation **Act** ('Implementatiewet') revised Payment Services Directive (PSD2) on 4th December 2018

Decree

- The Implementation **Decree** basically sets the new, stricter licensing requirements, security issues etc. amending e.g. the Prudential Supervision Act
- Dutch Council of State ('Raad van State') expected to issue advice on the Implementation Decree soon
- Minister of Finance indicated that the **Decree** will take effect simultaneously with the Implementation **Act**
- **Act & Decree** to be published in Dutch 'Staatscourant' – not expected before 2nd half of January 2019

- **EBA *Opinion* on the implementation of the RTS on SCA and CSC**
 - Published 13 June 2018
- **EBA *Guidelines* on the conditions [...] an exemption from contingency measures under Article 33(6)**
 - Published 4 December 2018
- **EBA *Opinion* on the use of eIDAS certificates under PSD2**
 - Published 11 December 2018
- **EBA Q&A tool for PSD2**
 - 130 questions submitted / ~15 answered (status begin December)

Stakeholder landscape in the implementation phase

Aiming at a smooth & sustainable implementation of PSD2-XS2A incl fall-back ex.



	Regulators & supervisors	Market participants
EU	EBA • Coordination platform ECB / ERPB • “API access scheme”	Berlin Group • NextGenPSD2 Implementation Support Project (NISP) EC • API Evaluation Group (dormant)
NL	DNB • Supervisory process MOB • WG Toegang tot de betaalrekening • WG Efficiency & Europese zaken • PSD2 “issues group”	Dutch Payments Association • National Implementation Support Project (NISP-NL)

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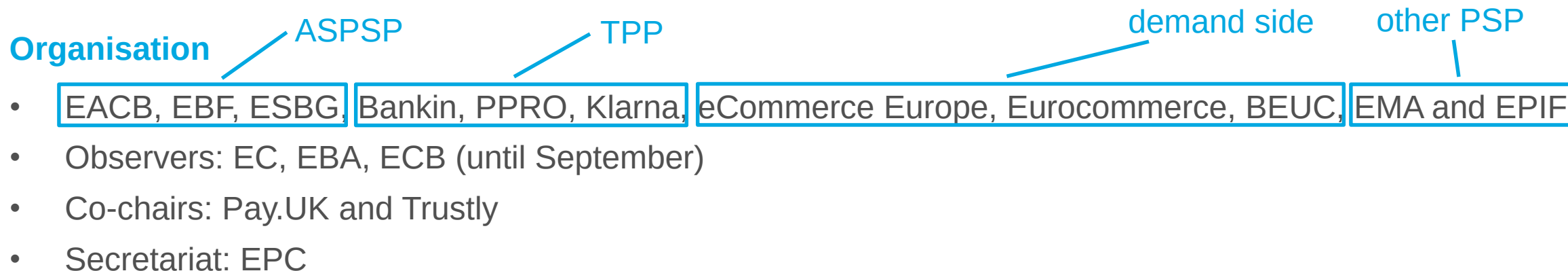
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API Evaluation Group (1)

NCA is able to grant ASPSP **exemption** with regard to the obligation to offer **fall-back**, provided that the dedicated interface meets stringent quality and availability **criteria**, has been extensively tested, etc.

Criteria are drafted and must apply to the whole EU due to the *level playing field*

- this is the work of the **API Evaluation Group**, an initiative of the European Commission (Dec. 2017)
- exemptions are determined by the NCA



API Evaluation Group (2)

Objectives of the API EG

- Full clarity on requirements for APIs to qualify for exemption of the fall-back obligation - '*legal bottom line*'
- Listing of non-obligatory additional functionality - supported via the API - '*recommended functionalities*'
- Outcomes of the API EG must be consistent with the *EBA Opinion*

Status

- List of 47 Recommended Functionalities published on November 9 – directed at NCAs
 - “This document provides the API EG’s view of where the market is at the time of publication and offers guidance to the market as per the scope and mandate of the API EG.”
- List of RF clarifies to what extent APII support them – December 10 update with Slovak APII
- API EG now dormant, new releases not foreseen at this point in time

Four categories

1. Legally required – with consensus
2. Not legally required – with consensus; possible with market facing agreement
3. Dissenting opinion, no consensus
4. To be clarified by EBA using the Q&A tool process, such as ...
 - Provide 'name of the PSU' to a PISP
 - Provide balance prior / after payment initiation
 - Access to the 'trusted beneficiary list' for PISP and AISP
 - Renew consent of PSU access after 90 days using AISP credentials→ ... then falls into category 1. or 2. (or 3.?)

Open issues Recommended Functionalities / API EG (1)

For reference only

RF No.	Description	Legally required	NextGenPSD2 supported
2 (e)	Prior to initiation of the payment, provide or make available to the PISP the <u>IBANs</u> (or equivalents) and <u>currencies</u> as available to the PSU for all payment accounts	EBA Q&A	Y
2 (f)	Provide or make available to the PISP and to the AISP the <u>name of the PSU</u> (payer / AISP user)	EBA Q&A	N
2 (g)	Provide or make available to the PISP the <u>current balance</u> of the payment account <u>prior and/or after</u> the initiation of the payment in case such balance is shown to the PSU directly	EBA Q&A	Y, via AIS
4	Should provide <u>data granularity</u> in terms of data elements and time range covered (e.g. account statement data for a particular account over a certain amount of time) to ensure that there is an efficient way to access the appropriate data as per the PSU consent.	EBA Q&A	time parameters, delta function
5	Should provide access to the <u>trusted beneficiary list</u> to the <u>AISP</u>	EBA Q&A	N
6	Should provide access to the <u>trusted beneficiary list</u> to the <u>PISP</u> .	EBA Q&A	N

Open issues Recommended Functionalities / API EG (2)

For reference only

RF No.	Description	Legally required	NextGenPSD2 supported
6	Should allow for the payee for a PISP-initiated payment to be <u>added to the trusted beneficiary list</u> as part of the PIS flow.	N	N
6	Should enable the PISP to <u>push information</u> or suggest additions to <u>the beneficiary list</u> .	N	N
21	Should enable the ASPSP to support an AIS journey where the PSU goes through SCA using the ASPSP issued credentials during initial consent and <u>subsequent renewal after 90 days</u> would be carried out in such a way as to not to burden the PSU providing <u>PSU's explicit consent</u> is obtained every 90 days <u>by the AISP</u> .	EBA Q&A	Y
22	Should enable a technical <u>solution</u> to support communication between an ASPSP and an AISP, PISP or CBPII <u>regarding who does SCA</u> .	EBA Q&A	Unclear requirement
25	Should require that when an agreement is cancelled by the consumer to the ASPSP (his/her bank) or the TPP, the party which has received the <u>cancellation</u> should <u>inform the other party</u> .	N	Y

Open issues Recommended Functionalities / API EG (3)

For reference only

RF No.	Description	Legally required	NextGenPSD2 supported
26	Should enable ASPSPs to <u>push data updates to AISP</u> s in real-time as the changes are applied.	N	N
36	Should enable the ASPSP to support a <u>mixed AIS/PIS journey</u> in one communication session, implying three scenarios: (iii) <u>one SCA</u> to allow the PISP to <u>initiate a payment</u> , and immediately thereafter in the same session to allow the AISP to <u>access AIS-regulated information</u> (one-time view only).	EBA Q&A	N
37	Should support the <u>exchange of data</u> between the AISP or PISP and ASPSP pertinent to <u>fraud handling</u> .	N	N
38	Should enable the <u>PISP to explicitly request an SCA</u> or to request an <u>SCA exemption</u> and send corresponding supporting data to the ASPSP, e.g. suggesting the payment to be initiated is high risk and that no exemption should be applied, or that it is a low risk transaction, which could benefit from an SCA exemption.	N	Unclear requirement

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Rationale

- Scheme approach should be based on mutual benefits
- Should be broader than PSD2 compliance including value added elements for ASPSPs and TPPs

Possible elements of an ‘API access scheme’

- Framework for rules applying to adhering participants
- Covering PSD2 functionalities as basis
- Contains “plus” services: other accounts, e-mandates, customer authentication
- End-to-end process flows, not just PSP-PSP but entire customer journey
- Supported by a standardised API interface
- Economic conditions for “plus” services to be determined
- Adherence optional but based on a contract making obligations and liabilities clear

ECB / ERPB – API access scheme

New ERPB Workstream in 2019 workplan



- Draft mandate for the group / call for candidates expected end this week
- Should define key elements of business requirements and governance
- Technical layer shall rely on API standardisation initiatives / API interface specification to be construed as a new but harmonised version of existing standards
- Dedicated group involving stakeholders but remaining lean / preparing a high-level proposal for June ERPB meeting
- Work should start soon, but without disrupting ongoing process to March/September PSD2 deadline

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- Supervisory process timelines
- MOB WG “Toegang tot de betaalrekening”
- EBA Guidelines
 - high-lights
 - post-consultation changes
- EBA follow-up / coordination platform

TPP perspective – Maurice Jongmans

- API review
- SCA exemptions
- Market expectations

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ASPSP perspective – Max Geerling

- NextGenPSD2 API framework
- NextGenPSD2 Implementation Support Project

Berlin Group / NextGenPSD2

Participants



51 participants

- Banking associations
- Payments associations
- Banks
- Processors

Dutch Payments Association participates for the benefit of its members.



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Updated: 24-09-2018

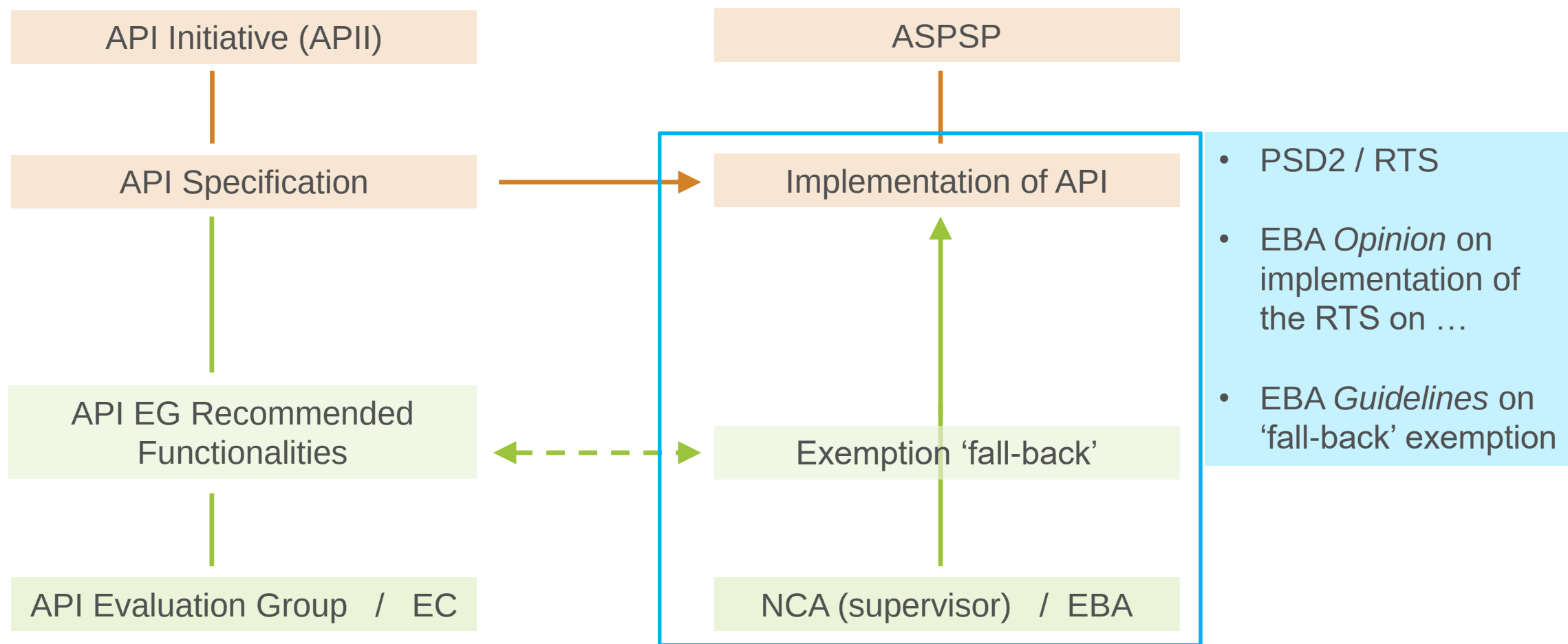
NextGenPSD2 is an *API framework*

- Operational Rules
- Implementation Guidelines

History

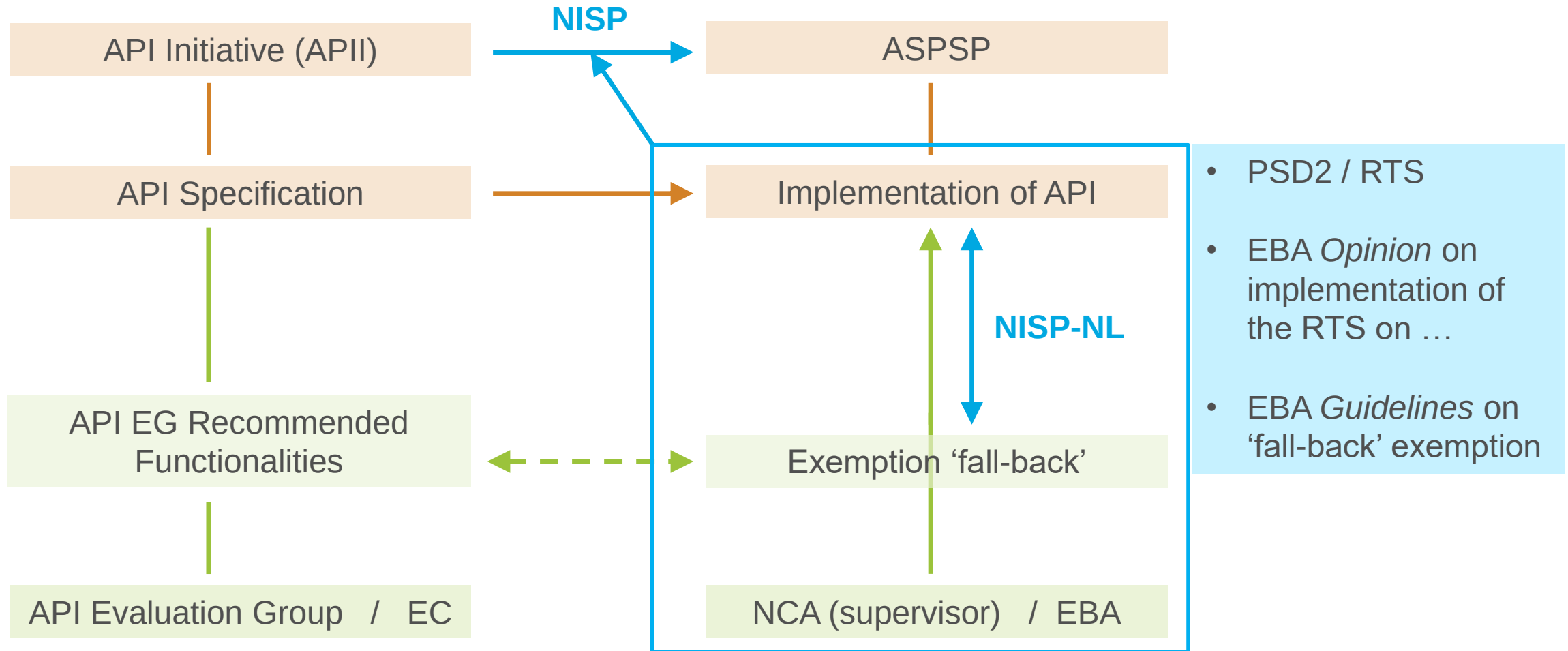
- May 2016 Establishment NextGenPSD2 taskforce
- February 2018 NextGenPSD2 Framework v1.0
- May 2018 Convergence with STET PSD2 API
- October 2018 NextGenPSD2 Framework v1.3 – last version before September 2019

Complicated supervisory dependencies



Two types of implementation support

From API Initiative and on a local level



- NextGenPSD2 Implementation Support Project (NISP)
 - Support for ASPSPs realising API implementations according to the NextGenPSD2 specifications
 - Focused on obtaining an exemption from the fall-back obligation by September 2019 at the latest
- NISP work streams
 - Compliance Best Practices – related to API implementation
 - ASPSP Testing – test concept, test cases, requirements for test tools
 - ASPSP Implementation Certification – evaluation & certification Policy (initially self-assessment)
 - TPP Integration Testing – by a Reference Implementation / TPP Sandbox
- Timelines: 2018 deliverables work streams – 2019 embedding of deliverables (test & pilot activities)
- Dutch Payments Association participates in NISP for the benefit of its members

Break

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Situation

- Members of Dutch Payments Association base their APIs on NextGenPSD2
- National usage and specificities

Aim

- Smooth implementation of the PSD2 API in the Netherlands
- Supporting ASPSPs to get an exemption of the fall-back obligation

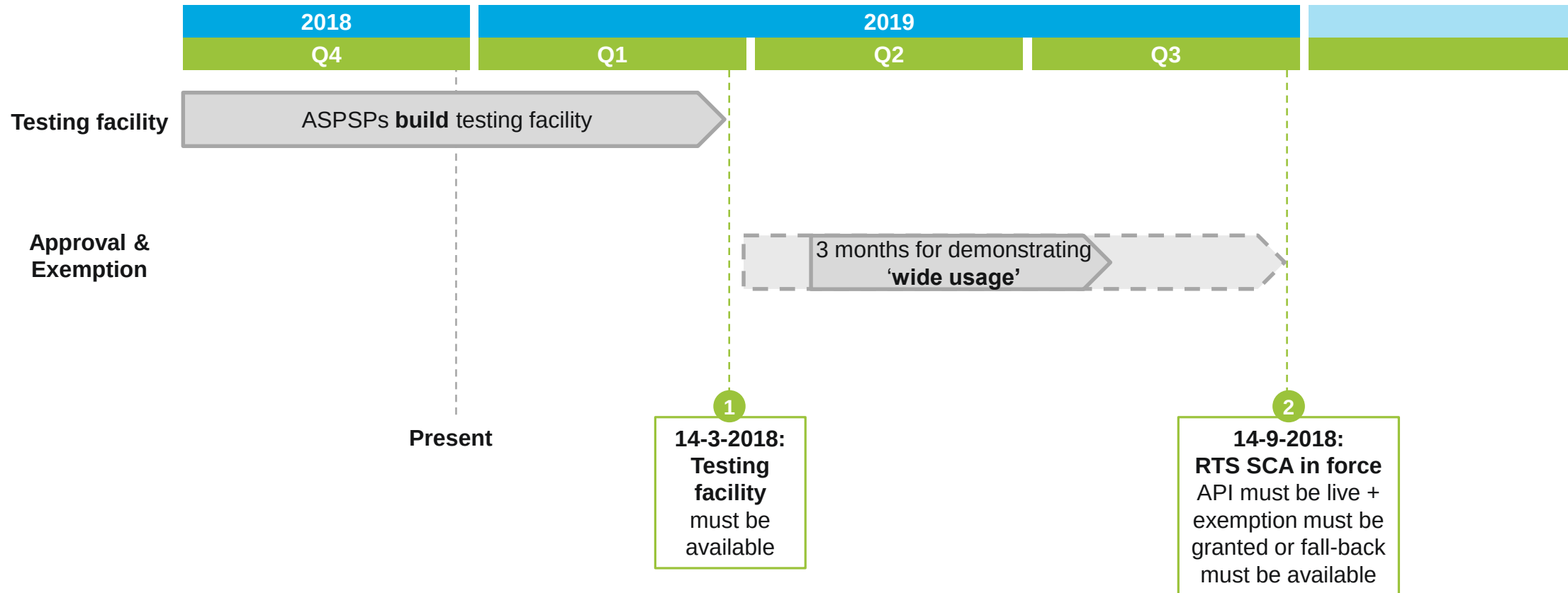
Approach

- Multi-stakeholder platform → NISP-NL
- Role for TPPs and other stakeholders in the 'exemption process'

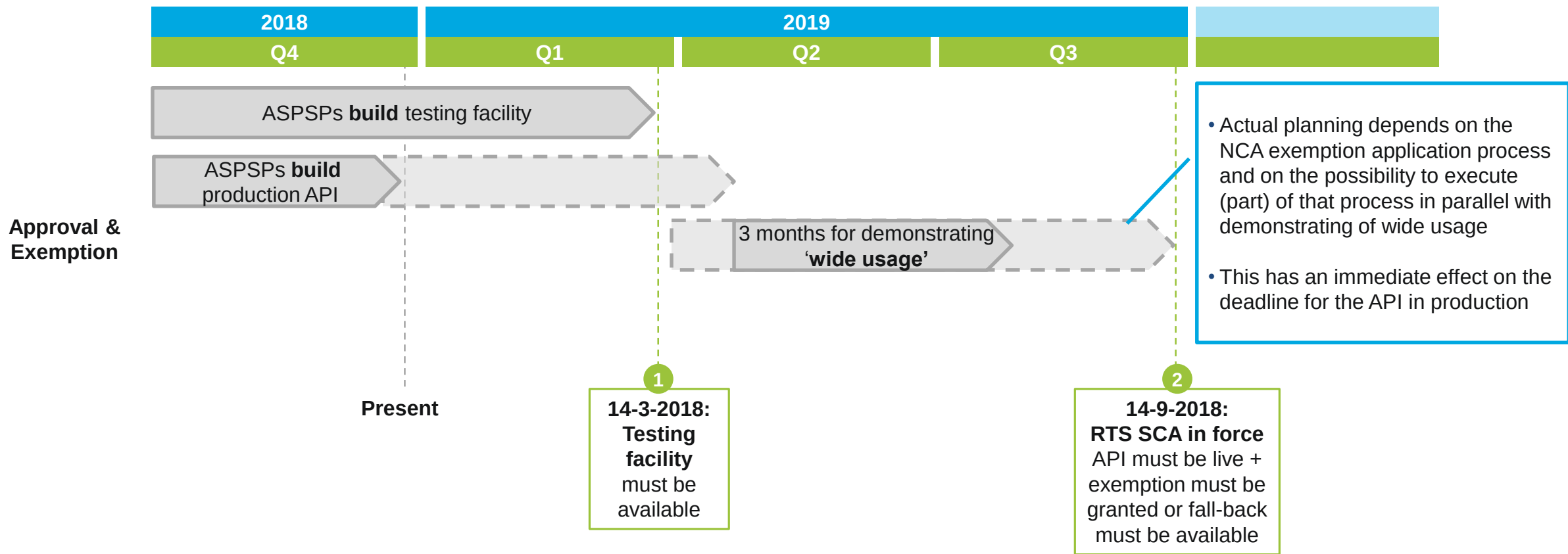
Timeline & milestones

- Now – March 2019 – June 2019 – September 2019

Two major milestones



Backwards planning determines the API deadline



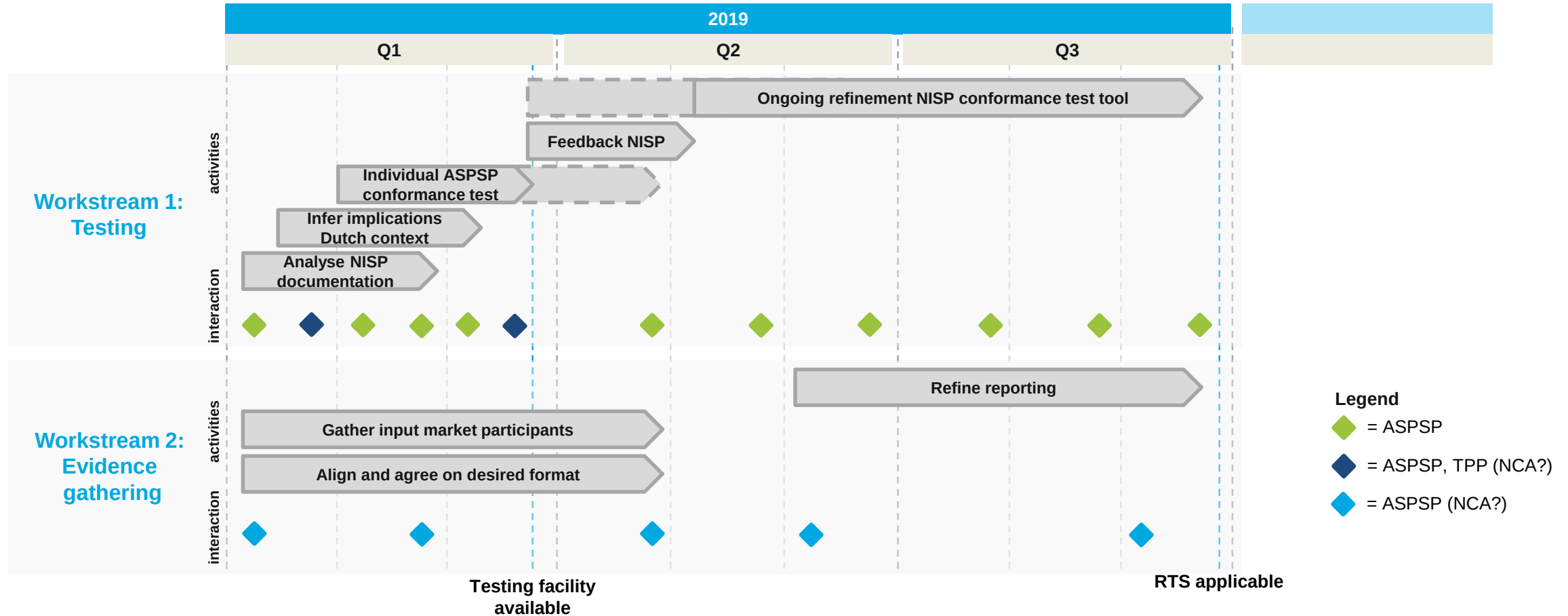
Two workstreams

Proposal for discussion

Topic	Description	Goal
1 Testing	- NISP offers ‘conformance testing’ tool for ASPSP APIs, incl. test concept, test cases and requirements for test tools - NISP ‘conformance testing’ is not specifically designed for Dutch context - NISP specifies best practices for ASPSP’s testing facility for TPPs, however, ASPSPs decide individually on following these best practices	Avoid duplication of ASPSPs effort by jointly assessing NISP deliverables’ applicability to Dutch context
2 Evidence gathering	ASPSPs need to report to NCA on wide array of topics, e.g.: - Service levels on availability and performance - Summary of results of stress test - Elaboration of methods of carrying out authentication procedures - Evidence that dedicated interface meets legal requirements - Summary of the results of market testing - Description of the usage of the dedicated interface - Evidence ASPSP has made all reasonable efforts to ensure <i>wide usage</i> - Information on resolution of problems	Smooth exemption process by defining process and/or standards regarding ASPSP reporting obligations towards NCA

High-level workstream planning

Frequent interactions between stakeholders



Participant input & discussion

Next steps

- Process outcomes today
- Publish summary on website
- Detailed workstream planning
 - Workstream activities – desk work, ASPSP / TPP testing, stakeholder meetings, ...
- Call for participants
- Communication – forum / newsletter / ...

Questions?

