

Topic: Kick-off meeting NISP-NL

Date: 14-12-2018



Participants

- **Members of Betaalvereniging Nederland**
- **Members of Vereniging Betaalinstellingen in Nederland**
- **TPPs (to be licensed / DNB procedure)**
- **Holland Fintech**
- **IT technology providers**

Agenda:

13:00 Welcome & introduction (Gijs Boudewijn, BVN)

13:30 NCA perspective – context & scoping (Evert Fekkes, DNB)

14:00 TPP perspective (Maurice Jongmans, VBIN)

14:30 ASPSP perspective (Max Geerling, BVN)

15:15 Implementation perspective (Max Geerling, BVN)

15:45 Participant input & discussion (Max Geerling, BVN)

16:45 Next steps & closing

13:00 Welcome & introduction (Gijs Boudewijn, BVN)

- Gijs discussed the status of the transposition of PSD2 into Dutch legislation
- The stakeholder landscape in the implementation phase was introduced: two axes determine the stakeholder landscape: stakeholders on EU-level vs NL-level and stakeholders that are regulators/supervisors vs market participants
 - Regulators & supervisors – EU-level: EBA, ECB/ERPB
 - Regulators & supervisors – NL-level: DNB, MOB
 - Market participants – EU-level: Berlin Group, EC
 - Market participants – NL-level: Dutch Payments Association (NISP-NL)
- The outcome of the API Evaluation Group was discussed (i.e. the 'Recommended Functionalities')

- The proposed ECB / ERPB “API access scheme” was discussed, and it was indicated that the ERPB is defining a workstream to start working on the topic in 2019, with deliverables to be expected end of Q2 2019
- Gijs scoped the discussion for today, stating that in scope for the discussion is the implementation of PSD2 ‘Access to account’ (XS2A) in the Netherlands

13:30 NCA perspective – Context & scoping (Evert Fekkes, DNB)

- Evert informed on the different timelines relevant in PSD2 XS2A and on the process of the exemption to the fallback, by elaborating on the recently published Exemption Process Guideline, more specifically Guidelines 6 (Design), 7 (Usage) and 8 (Problems).
- The formal process of the exemption to the fallback will be elaborated on 23-1-2019 by DNB in a meeting for ASPSPs
- It was elaborated that ‘testing’ and ‘wide usage’ obligations for ASPSPs can run in parallel, and do not necessarily have to be performed in succession
- Evert stressed that DNB would like to see ASPSPs engaging as soon as possible with DNB to discuss their exemption request (iterative process)
- Evert stressed the importance of a dialogue between AS-PSPs and TPP regarding what issues arise for both parties as a result of the PSD2 XS2A provisions. The forum to discuss desired functionalities in NL is the MOB (Maatschappelijk Overleg Betalingsverkeer)
- As a follow up of the API Evaluation Group, the EBA is planning a working group in supporting the development of APIs ahead of September 2019. The group will be composed of EBA staff, NCAs and representatives of a variety of external stakeholders and will be chaired by the EBA. The aim is to identify issues that will emerge as the industry is preparing for the application date of the RTS on SCA & CSC

14:00 TPP perspective (Maurice Jongmans, VBIN)

- VBIN has performed a review on the available PSD2 APIs of Dutch ASPSPs (the public developer portals)
- This API review was based on
 1. NextGenPSD2 minimal functionalities
 2. Functionalities of iDEAL
 3. Functionalities to drive innovation in the Dutch payment landscape
- Analysis showed that 4 out of 8 ASPSPs that were reviewed have currently published the technical specifications of their dedicated interface (API)
- Only 1 ASPSP currently offers the NextGenPSD2 minimal functionalities. For all other ASPSPs these functionalities are expected to be added; under the scope of PSD2 XS2A
- After some discussion in the group, the common view was that functionalities under 2. and 3. do not fall under the compliance scope of PSD2 XS2A, but instead fall in the competitive domain

- The MOB (Maatschappelijk Overleg Betalingsverkeer) was indicated as the forum in The Netherlands to discuss the demand for functionalities that go beyond PSD2 XS2A minimum compliance

14:30 ASPSP perspective (Max Geerling, BVN)

- Max elaborated on the history and current status of the NextGenPSD2 (Berlin Group) framework
- NextGenPSD2 has launched the NISP initiative (i.e. NextGenPSD2 Implementation Support Project), aiming to support ASPSPs realising API implementations according to the NextGenPSD2 specifications and focusing on obtaining an exemption from the fallback obligation
- NISP has defined 4 workstreams
 - Compliance best practices – related to the API implementation
 - ASPSP testing – test concepts, test cases, requirements for test tools
 - ASPSP implementation certification – evaluation and certification Policy
 - TPP Integration testing – by a reference implementation / TPP sandbox
- BVN participates in NISP for the benefit of its members and shares available material and related interpretations thereof

15:15 implementation perspective (Max Geerling, BVN)

- As Dutch ASPSPs base their PSD2 APIs on NextGenPSD2, BVN aims to support its members by acting in the 'liaison-role' for NISP
- BVN aims to support its members with 1) smooth implementation of the PSD2 APIs in the Netherlands and 2) support ASPSP in obtaining exemption to the fallback obligation
- BVN sees collaboration between ASPSPs and TPPs as a crucial factor in realising these two goals
- BVN proposed collaboration in two work streams, following from the recently published Exemption Guideline and the intended NISP deliverables:
 - **Testing:** avoid duplication of ASPSP's effort by jointly assessing the applicability of NISP deliverables to the Dutch context to potentially streamline conformance testing by ASPSPs to the NextGenPSD2 API specifications and TPP integration testing
 - **Evidence gathering:** enable smooth fallback exemption process by defining uniform manner to collect and capture evidence as set out in the Exemption Guideline
- This collaboration is referred to as the 'NISP-NL work stream approach'
- Detailed approach for the two workstreams will follow as soon as possible, outlining set-up/organisation, activities, deliverables and planning

15:45 participant input and discussion (Max Geerling, BVN)

- All participants were asked to deliver input on the proposed collaboration in NISP-NL
- The following questions were asked:
 - In what role are you present today?
 - How do you rate the proposed NISP-NL work stream approach
 - What should be the main outcome(s) of the proposed NISP-NL approach?
 - How do you see your own involvement in the proposed NISP-NL work stream approach?
 - What other recommendations do you have for the proposed NISP-NL work stream approach?
 - What do you see as the biggest challenge for the coming period (e.g. testing period)?
 - Given the current stakeholder forums, meetings etc. do you feel you can sufficiently address topics regarding XS2A?
 - What recommendations do you have for the MOB?
 - Did we miss something that you think we should not forget?
- What should be the main outcome(s) of the proposed NISP-NL approach?
 - Initially form clear insight in expectations by TPPs and ASPSPs as a result of collaboration,
 - Clear route towards PSD2 XS2A compliance
 - Clarity on what topics the NL market can and should collaborate on in the coming months
 - Knowledge sharing on NISP deliverables, relevant EBA opinions, RTSs, guidelines
 - Streamlined interaction between ASPSPs and TPPs and ASPSPs and DNB
- How do you see your own involvement in the proposed NISP-NL work stream approach?
 - The answers pertained mostly to sharing knowledge, sharing feedback regarding the implementation and testing of PSD2 APIs, actively participating in discussions, evaluating work that is delivered by the two workstreams
 - The discussion revolved also around *how* this would take place. BVN has taken it upon themselves to propose to the group an approach, detailing collaboration in the two proposed workstreams from January 2019 until 14 September 2019
- What other recommendations do you have for the proposed NISP-NL work stream approach?
 - The answers pertained mostly to keeping the scope and goals of NISP-NL simple (by having clarity on where to discuss what topics), ensuring alignment between all relevant parties, most notably the DNB, TPPs and ASPSPs, ensuring transparency regarding the process
- What do you see as the biggest challenge for the coming period (e.g. testing period)?
 - The answers pertained mostly to legal unclarity, short timelines for PSD2 XS2A compliance, correctly managing expectations regarding PSD2 API functionality, presence of sufficient number of TPPs to test PSD2 APIs in testing period

- Given the current stakeholder forums, meetings etc. do you feel you can sufficiently address topics regarding XS2A?
 - In the answering of this question, once more the remark was made and accepted by the group that XS2A compliance and desired API functionality constitute two different topics, and should be discussed in separate forums
 - The general consensus in the group was that indeed topics regarding PSD2 XS2A can sufficiently be addressed
- What recommendations do you have for the MOB?
 - This question was added during the meeting as a result of previous discussions regarding the scope of PSD2 XS2A compliance vs. the functionalities desired by market parties (most notably TPPs)
 - The answers pertained mostly to functionalities that are not in scope for PSD2 XS2A compliance, but also stressed collaboration between TPPs and ASPSPs
- Did we miss something that you think we should not forget?
 - One respondent indicated that we should be aware of including all relevant stakeholders in the process (albeit in differing roles), including for example the ACM (Autoriteit Consument en Markt). The group had a common view on this.