

14 December 2018

Call for expressions of interest to the EBA's Working Group on APIs under PSD2 (WG-API)

Background

1. In March 2018, the EBA's RTS on Strong Customer Authentication and Common and Secure Communication was published in the Official Journal of the EU as Commission Delegated Regulation (EU) 2018/389. The RTS requires *inter alia* that account servicing payment service providers (ASPSPs) provide at least one interface for third party payment service providers (TPPs, comprising account information service providers, payment initiation service providers and card-based payment instrument issuers) to be able to access payment account information and initiate payments.
2. To that end, many ASPSPs have decided to develop dedicated interfaces, and more specifically application programming interfaces (APIs). In such cases, the RTS further requires ASPSPs to also adapt their customer-facing interface, to allow access by TPPs through such interface as a fall back in the event that the dedicated interface does not perform in accordance with the service level targets mandated by the RTS. However, the RTS also provides that ASPSPs may obtain an exemption for the obligation of having such fall back, provided they meet the conditions set out in Article 33(6) of the RTS and further detailed in the EBA Guidelines on the exemption (EBA/GL/2018/07).
3. However, the timelines for payment service providers to become compliant with the RTS and the Guidelines are demanding, in particular for ASPSPs to meet the conditions for an exemption from the obligation to implement the fall back mechanism. The EBA is therefore setting up a working group on APIs under PSD2 (WG-API), with a view to facilitate industry preparedness for the RTS and to support the development of high-performing and customer-focused APIs under PSD2.

Aims

4. The WG-API will consist of EBA staff, national authorities, EU institutions, plus external stakeholders from whom the EBA is herewith inviting expressions of interests. The group will identify issues and challenges that market participants will face during the testing and use of ASPSPs' production interfaces in the crucial period leading up to September 2019. The external stakeholders will also be asked to propose, in a collaborative environment, solutions on how to the identified issues could be addressed, which the EBA and national authorities will consider.
5. The resultant discussions will help inform the approaches taken by the EBA and national authorities in respect of the supervision of applicable requirements and will contribute to a harmonised approach across the 28 EU Member States. The outcomes of the discussions of the meetings of the group will be published on the EBA's website, in a form yet to be decided by the EBA. The views expressed will, however, not be attributed to individual working group participants.
6. The first meeting is envisaged to take place in the third week of February 2019, on the EBA's premises in London, with one or two further meetings held in the first half of 2019. Details of subsequent meetings will be decided at a later stage.

Composition

7. In addition to EBA staff, national authorities and other EU institutions, expressions of interest are sought from the following types of market participants:
 - A. Account servicing payment services providers (banks and non-banks);
 - B. Account information service providers;
 - C. Payment initiation service providers;
 - D. Card-based payment instrument issuers;
 - E. API initiatives; and
 - F. Others (e.g. payment service users (consumers or businesses); technical service providers, standardisation bodies, etc.).

Selection criteria

8. Nominations to become a participant of the WG-API are invited from individuals with:
 - Experience in the design, implementation, and/or use of APIs, or their standardisation;
 - Experience, ability and willingness to contribute to discussions in a way that is conducive to the objectives of PSD2 and that will lead to better outcomes for all market participants, rather than for specific constituencies only; and
 - Knowledge of the PSD2 and the EBA's regulatory requirements pertaining to dedicated interfaces, as set out in the EBA's [EBA RTS on SCA&CSC](#), the [EBA Guidelines on the exemptions from contingency measures](#); the [EBA Opinion on the implementation of the](#)
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[RTS on SCA&CSC](#); the [EBA Opinion on the use of eIDAS certificates](#), and relevant questions and answers in the [EBA's Q&A tool](#).

9. Expressions of interest should be submitted to the EBA **by 14 January 2019 cob**, by using the link provided [here](#).
10. The EBA will chair the group and will select its participants based on the aforementioned criteria. In so doing, and for the group to be effective and have a balanced composition for example in terms of geography and type of market participant, the EBA may not be able to accommodate all applicants. The EBA will inform all applicants by 4 February 2019 whether or not they have been accepted as a participant. Participants will be expected to cover their travel costs for attending the meeting.
11. Once the group is established, and should additional expertise that is not represented in the group be required for a particular topic, the EBA may decide to invite additional individuals to particular meetings of the group.