



EUROPEAN CENTRAL BANK

EUROSYSTEM

Feedback statement

Responses to the public consultation
on the draft European Central Bank
Regulation amending Regulation
(ECB/2013/43) on payments statistics

December 2020



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Executive summary

On 27 February 2020 the European Central Bank (ECB) launched a public consultation on the draft ECB Regulation amending Regulation (EU) No 1409/2013 of the ECB of 28 November 2013 on payments statistics (ECB/2013/43)¹ (hereinafter, the amending Regulation), which updates the requirements for collecting and reporting payments statistics.

Since the Regulation was first adopted, there have been a number of changes in the payments landscape both in Europe and globally that needed to be reflected in the update of the Regulation. The integration of payments in euro through the single euro payments area (SEPA), the entry into the market of new service providers and innovations as well as new payment solutions, such as digital wallets, contactless and mobile payments, were all issues considered carefully in the process of updating the Regulation. Additionally, the aim has been to cover all uses of payments statistics, including that of better monitoring cross-border trade, with a single Regulation. In updating the Regulation, relevant changes to the EU legislation have also been taken into account, in particular the amendment to the Payment Services Directive (EU) 2015/2366 (PSD2)² and the adoption of the Interchange Fee Regulation (Regulation (EU) 2015/751 of the European Parliament and of the Council of 29 April 2015 on interchange fees for card-based payment transactions) (IFR)³.

The amending Regulation introduces new statistical reporting requirements to account for these developments in the area of payments, while also addressing a need for additional payments statistics in order to meet a variety of new user requirements. The enhanced statistics will better support the European System of Central Banks (ESCB) in its role as a catalyst in the retail payments market and also as overseer of payment instruments, schemes and systems, while contributing to a better understanding of developments in cross-border trade in goods and services.

In order to limit the reporting burden for the industry, derogations from part of the reporting by smaller institutions will be possible. Such derogations may be granted at the discretion of national central banks (NCBs), subject to a limited set of statistical reporting requirements to be reported on an annual basis with a half-yearly breakdown. This allows the amending Regulation to take into account the principle of proportionality and equal treatment of all reporting agents covered by the amending

¹ Regulation (EU) No 1409/2013 of the European Central Bank of 28 November 2013 on payments statistics (ECB/2013/43) (OJ L 352, 24.12.2013, p. 18).

² Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC (OJ L 337, 23.12.2015, p. 35) was updated to include new payment services and to govern the authorisation of new types of payment institutions providing those services, while at the same time introducing measures to enhance the security of electronic payments.

³ Regulation (EU) 2015/751 of the European Parliament and of the Council of 29 April 2015 on interchange fees for card-based payment transactions (OJ L 123, 19.5.2015, p.1) introduced, inter alia, changes in the reporting regime of those payments.

Regulation in all Member States. Moreover, the reporting requirements set out in the Regulation have been closely aligned with those in the European Banking Authority Guidelines on fraud reporting under Article 96(6) of PSD2⁴ (EBA Guidelines). As a consequence, reporting agents can avoid having to report the same statistics under these two different reporting frameworks which in turn could further minimise the reporting burden on reporting agents. Nonetheless, overseers of payment instruments, schemes and systems require more detailed information on payment fraud than supervisors of payment service providers. For this reason, the amending Regulation is more detailed than the EBA Guidelines in respect of fraud reporting.

The public consultation on this amending Regulation was launched on 27 February 2020 following the approval of the Governing Council of the ECB and was originally envisaged to last for six weeks. In addition, a public hearing was scheduled for 23 March, but was cancelled due to the coronavirus (COVID-19) outbreak. In recognition of the difficulties this has caused, the deadline for submission of comments to the public consultation was moved to 7 May, allowing for a 10-week consultation. The ECB gratefully acknowledges the efforts of the respondents to this consultation.

The ECB received 24 written responses, all with relevant input. Following the public consultation and the response from the European Commission, the ECB analysed and gave due consideration to all comments received and subsequently revised the amending Regulation. The most fundamental changes to the text of the amending Regulation are:

1. the postponement of the deadlines for first reporting;
2. changes to breakdowns with a view to alleviating the reporting burden;
3. the amendment of Article 4 on derogations to better clarify when NCBs can exempt reporting agents from reporting statistical information;
4. simplification of some geographical breakdowns;
5. clarification on the reporting of Merchant Category Codes (MCC);
6. clarification in respect of reporting certain payments breakdowns;
7. clarification of reporting requirements connected to the EBA Guidelines;
8. changes to some definitions to better align with existing definitions in other European legislation, as far as possible, for the purposes of ESCB tasks;
9. other clarifications, particularly as to which institutions should report certain breakdowns.

This feedback statement presents the ECB's assessment of the comments received.

Following the assessment, a revised amending Regulation was forwarded to the Governing Council of the ECB and adopted as the ECB Regulation amending

⁴ EBA/GL/2020/01

Regulation (EU) No 1409/2013 of the ECB of 28 November 2013 on payments statistics (ECB/2013/43) on 1 December 2020. The amending Regulation was published on the ECB's website on 11 December 2020, together with this feedback statement.

1 Overview and analysis of responses

The ECB released the amending Regulation for public consultation on 27 February 2020. The period for submission of comments ran until 7 May 2020. A total of 621 individual comments from 24 respondents were received. Submissions were made by NCBs, national and European associations representing the interests of the payments sector, a payment system operator (PSO) as well as by individual payment service providers (PSPs). Table 1 on the following page shows the breakdown of responses by type of respondent and the specific part of the amending Regulation commented on.

In general, respondents welcomed the opportunity to comment on the amending Regulation, highlighting the current operational difficulties resulting from the COVID-19 pandemic. Given these difficulties it is not surprising that a majority of respondents requested a longer implementation period to allow for system adjustments in order that reporting agents would be able to report the large amount of new statistical information required as compared with the existing Regulation on payments statistics. Respondents welcomed the efforts made by the ECB to achieve methodological alignment with similar reporting requirements of the EBA Guidelines that allow for a single reporting (single data flow) of fraud statistics with the aim of minimising the burden on reporting agents.

Some respondents questioned the level of detail required, particularly considering the purposes the statistics are designed to serve. Respondents also pointed to difficulties they would have with some of the reporting requirements, with the focus depending on their role in relation to the particular payment service in question. More specifically, it was pointed out that some information could be more readily available to some participants in a payment transaction than others. In addition, some explained the different level of availability, certainty and timeliness of fraud data as compared with payments data. There were also calls for greater clarity on the provisions relating to the application of derogations and in respect of who would be responsible for reporting certain items.

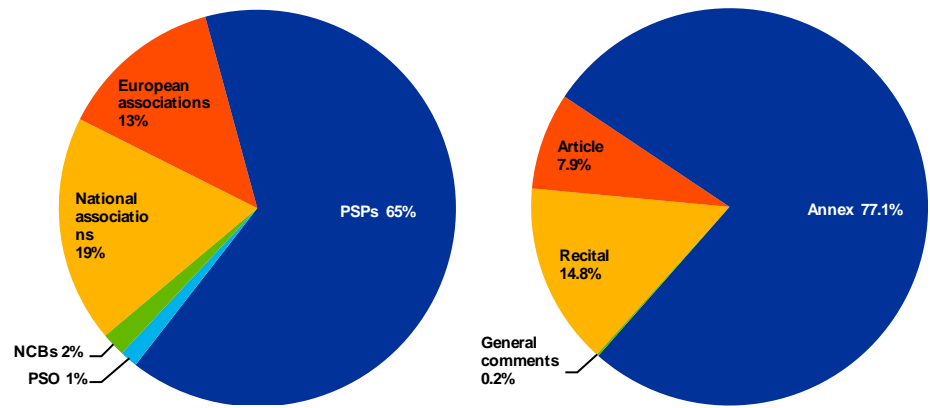
Following the public consultation, the ECB analysed and gave due consideration to all comments received. This feedback statement presents the ECB's assessment of those comments. For ease of understanding, references to specific provisions of the amending Regulation are made to the draft released for public consultation on 27 February 2020. A table summarising the amendments made to the amending Regulation following the public consultation is included in Section 6.

The amending Regulation was forwarded for approval to the Governing Council of the ECB, which adopted it on 1 December 2020. The amending Regulation was published on the ECB's website on 11 December 2020, together with this feedback statement.

Table 1

Breakdown of responses by type of respondent and specific part of the amending Regulation commented on

	National associations	European associations	PSPs	PSO	NCBs	Total
Recital	13	0	78	0	1	92
Article	16	2	20	7	4	49
Annex	86	81	303	2	7	479
General comments	0	0	1	0	0	1
Total	115	83	402	9	12	621



2 Rationale for and scope of the amending Regulation

2.1 Rationale for the amending Regulation

Payment systems play a pivotal role in any modern economy. They facilitate the flow of money within the economy and have a significant bearing on the efficiency and stability of financial markets. With a view to enhancing transparency of these systems and in order to support integration within the market for European payment services, since 2000 the ECB has been collecting and publishing comprehensive annual statistics that cover cashless payments and payment systems in the Member States of the European Union (EU). Since 2014, these statistics have been based on the regular collection of harmonised statistical information from PSPs within the scope of the Regulation on payments statistics. Since the Regulation was adopted, there have been a number of changes in the payments landscape both in Europe and globally that needed to be reflected in the update of the Regulation. The integration of payments in euro through the establishment of SEPA, the entry into the market of new service providers and innovations as well as new payment solutions, such as digital wallets, contactless and mobile payments, were all considered carefully in the process of updating the Regulation. Additionally, the aim has been to cover all uses of payments statistics, including that of better monitoring of cross-border trade, with a single regulation. In updating the Regulation, relevant changes to EU legislation have also been taken into account, in particular the amendments introduced in PSD2 and the adoption of the IFR.

The amending Regulation's proposed wider scope is to cover data on fraudulent payment transactions, which are needed for the ECB's oversight function. PSPs are already required to report statistics on fraudulent payments to their national competent authorities (NCAs) for supervisory purposes on the basis of the EBA Guidelines. Nonetheless, overseers of payment instruments, schemes and systems require more detailed information on payment fraud than supervisors of payment service providers do. The Eurosystem, in its statutory role as overseer of payment instruments and schemes, requires the reporting of these more detailed statistics to monitor the evolution of payment fraud in order to achieve its objective to ensure a high degree of payments security, and ultimately to maintain confidence in the euro and promote an efficient economy. Consequently, the amending Regulation is more detailed than the EBA Guidelines in respect of fraud reporting.

In order to avoid double reporting of statistics on fraudulent payment transactions under the EBA Guidelines and the amending Regulation, the methodological alignment of these two legal frameworks has been a high priority. Such an alignment

would facilitate a single reporting of these statistics to the respective national authorities for both oversight and supervisory purposes by way of a single data flow⁵.

2.2 Scope of the amending Regulation

Taking into account the identified user needs, innovative retail payment services and changes to the regulatory environment, the scope of the amending Regulation has increased significantly in terms of the items to be reported, the level of detail required and the reporting frequency. Consequently, the amending Regulation includes new requirements to collect statistics on (i) fraudulent payments, (ii) authentication methods for payment transactions and (iii) payment schemes. In addition, MCC should be reported when available with a worldwide country breakdown. The reporting scheme now also includes payments using mobile devices, contactless payments and e-commerce. In addition, new types of payment institutions authorised under PSD2 that provide payment initiation services (Payment Initiation Service Providers (PISPs)) and account information services (Account Information Service Providers (AISPs)) are now included in the reporting population for the first time.

As with the current Regulation, the amending Regulation is only binding on those Member States whose currency is the euro (euro area Member States). Nevertheless, non-euro area Member States are to implement all measures that they consider appropriate for collecting the statistical information needed to fulfil the ESCB's statistical requirements, and for making timely preparations for joining the euro area.

⁵ The single data flow is subject to national local cooperation arrangements. Pursuant to Article 3(1) of the amending Regulation, the reporting agents are to report the statistical information to the relevant NCB, either directly or via the relevant NCA pursuant to local cooperation arrangements. Equally, as outlined in recitals, it should be possible for the confidential statistical information on fraud collected under this Regulation to be transmitted to an NCA to facilitate the data collection under Directive (EU) 2015/2366, provided that the rules for the protection and use of confidential statistical information in Council Regulation (EC) No 2533/98 are observed.

3 Analysis of merits and costs

3.1 The ECB's merits and costs procedure

The preparations for the drafting of the amending Regulation followed the principles and procedures set out in Council Regulation (EC) No 2533/98⁶. In designing and issuing its statistical regulations, the ECB follows the statistical principles underlying European statistics produced by the ESCB as set out in the “Public commitment on European Statistics by the ESCB”, particularly as regards the need to minimise the reporting burden.

Bearing in mind the ESCB's aim to perform its statistical function effectively, and in order to use resources efficiently when collecting, compiling and disseminating statistics, all requirements necessary to address new challenges and meet ever-changing information needs are subject to a “merits and costs procedure”. This is an in-depth investigation of the embedded costs and benefits for all stakeholders involved, including the financial institutions potentially affected.

Since its first application in 2000, the merits and costs procedure has been used in the drafting of around 16 ECB regulations on statistics in the context of Article 5 of Protocol (No 4) on the Statute of the ESCB and of the ECB and of Council Regulation (EC) No 2533/98. As far as the amending Regulation is concerned, the procedure was based on the emergence and recognition, in principle, of new user needs for aggregated or more detailed data, and involved the following steps:

- fact-finding, via a detailed questionnaire addressed to representatives of the potential reporting population, which enabled the scope and concepts to be better defined and alternative data sources to be explored; it entailed an initial feasibility assessment leading to the exclusion of the most demanding or costly features;
- a costs assessment, via a questionnaire addressed to statistical compilers in the ECB, the NCBs and reporting agents, to estimate the costs of collecting the information identified in the previous step, and to enable a more in-depth view of the costly features, differentiating between set-up and running costs for reporting agents;
- a merits assessment, via a questionnaire circulated to data users, to assess the expected benefits in the light of the potential costs incurred;
- an assessment of the balance between merits and costs, in which the ESCB – assisted by its relevant committees and sub-structures – weighed the benefits of the various options for users against the costs for compilers and reporting

⁶ Council Regulation (EC) No 2533/98 of 23 November 1998 concerning the collection of statistical information by the European Central Bank (OJ L 318, 27.11.1998, p.8).

agents and, based on the findings, produced a draft amending Regulation to be submitted to the Governing Council of the ECB.

3.2 The merits and costs procedure as applied to the amending Regulation

In drafting the amending Regulation, the approach followed while designing the requirements for collecting payments data was fully aligned with the merits and costs procedure, which ran from late 2017 until late 2019.

The costs assessment carried out by the NCBs – in liaison with the reporting population – found that some of the main cost drivers across countries were similar, while others related mainly to whether the requested statistics were already reported nationally. The aspects identified by the reporting agents as the most expensive are listed below.

- **Level of detail:** the large increase in the volume of data to be reported was one of the cost drivers, but only in cases where the additional data were not already available in the reporting systems of the PSPs for other purposes. Thus, the increase in the number of breakdowns related to new payment services and the need for sectoral data (i.e. MCC) were considered costly by some reporting agents. On the other hand, the extension of the geographical coverage for some items has also led to a considerable increase in the reporting scope, but the breakdown of the information by country did not seem to be among the main cost drivers.
- **Timeliness:** reporting data to support GDP forecasting 7 or 15-20 calendar days after the end of the reference month was assessed to be very costly.
- **Frequency:** the costs of reporting fraud statistics were assessed separately for a semi-annual frequency and for a quarterly frequency. For the statistics for monitoring cross-border trade, annual, quarterly and monthly reporting frequencies were individually costed. For data collected for the purposes of GDP forecasting, the cost of monthly reporting was assessed. Reporting at a monthly frequency was generally identified as a significant cost driver. The existence of multiple requirements at both monthly and quarterly frequencies was itself a cost driver, resulting in different, overlapping rounds of production.

Regarding the merits assessment, users noted the envisaged improvements to policy formation, economic forecasting and security for the users of payment services that the new statistics would support. The user committees and the European Commission all welcomed the prospect of minimising the reporting burden for the industry by allowing for a methodological alignment of the statistics to be reported under the amending Regulation with similar statistics to be reported under the EBA Guidelines. The following were considered crucial for the users from a policy and oversight perspective:

- statistics on innovative payment services;

- statistics on fraudulent payments;
- statistics on payment authentication methods;
- MCCs;
- increased frequency of reporting.

The matching of merits and costs was the final step before drafting the amending Regulation. On the basis of the outcome of the costs assessment and the associated merits assessment, a proposal for the final form of the reporting scheme was drawn up.

The matching of merits and costs was approved by the ECB in September 2019.

4 Legal basis

Article 5 of Protocol (No 4) on the Statute of the ESCB and of the ECB requires the ECB, assisted by the NCBs, to collect the statistical information necessary to carry out the tasks entrusted to the ESCB. The relevant EU legislation which provides the framework for the ECB's statistical work is Council Regulation (EC) No 2533/98.

To perform the functions of the Eurosystem, the ECB may, subject to constraints imposed by EU legislation, adopt legal instruments that have a direct effect on certain entities resident in the euro area. These entities comprise the reference reporting population for ECB statistics, which includes, inter alia, all payment service providers and payment system operators. These legal instruments are ECB Regulations which set out the ECB's statistical requirements for all reporting entities resident in the euro area. They are binding on the entities to which they are addressed and are directly applicable, meaning that they do not need to be transposed into national law to the extent that no such transposition is foreseen. They instruct reporting entities on, for example, statistical reporting requirements in terms of definitions, classifications, frequency and timeliness.

As provided for by Article 5 of Protocol (No 4) on the Statute of the ESCB and of the ECB and Council Regulation (EC) No 2533/98, it is the Governing Council of the ECB that determines which statistics are to be collected, compiled and disseminated by the ESCB.

To enhance the legislative process, on 4 October 2016 the Governing Council of the ECB decided to increase the transparency of developing ECB Regulations on European Statistics. In this context, the ECB conducted a public consultation on the amending Regulation. The public consultation, which started on 27 February 2020 and ran until 7 May 2020, gave interested parties the opportunity to comment on the amending Regulation. As part of this consultation, a public hearing was planned but was cancelled in the end due to the outbreak of COVID-19. Key documents – the amending Regulation, a summary of the related merits and costs procedure that took place between 2017 and 2019 and frequently asked questions – were made available on the ECB's website as background information. The ECB also formally consulted the European Commission, as required under Council Regulation (EC) No 2533/98, and informed the European Parliament. In parallel, the ECB also consulted the EBA, reflecting the ongoing cooperation between the ECB and the EBA aimed at minimising the burden to reporting agents when reporting fraud and related statistics.

5 Comments on specific parts of the amending Regulation

5.1 Request for postponement of the first reporting deadline

Comment. 19 respondents asked for the implementation period to be extended, so as to allow more than 12 months for implementation. Some respondents asked for 18 months, while others focused on the benefits of a further postponement to the start of a calendar year, as this would permit them to complete the current annual reporting with a full year's data, thereby allowing for better comparability in the long run. Some respondents noted that a considerable level of investment in new reporting systems and the necessary redeployment of staff working on other projects would cause them difficulties. Similarly, other respondents pointed to the amount of new data to be reported, some of which the reporting agents themselves would not otherwise need for business purposes and would therefore not have readily available in-house, resulting in the existing systems needing to be revamped or new systems built from scratch. Furthermore, all respondents that raised this issue agreed that the institutions' resources are currently stretched by the need to provide ongoing services to their clients during the COVID-19 crisis. Finally, several respondents pointed out that the amending Regulation would come on top of other ongoing projects connected to, among other things, supervisory requirements stemming from the amendment to PSD2, tying up staff that would be needed to develop systems for the new reporting requirements introduced with the amending Regulation.

Assessment. Taking into account the challenges that reporting agents face due to the COVID-19 crisis, Article 8 of the amending Regulation (now replaced by Article 8a) was amended in order to extend the implementation period for the reporting agents so that the first reporting of the new reporting requirements to the ECB is to begin with quarterly data for Q1 2022 by end-May 2022 and semi-annual data for H1 2022 by end-November 2022. The reporting of annual data with a half-yearly breakdown is to begin with semi-annual data for H1 and H2 2022 by end-May 2023.

5.2 Request to reduce the reporting burden

Comment. 9 respondents commented that the reporting obligations introduced appear to be disproportionate considering the purposes for which the statistics will be collected. For some respondents the level of detail required would generate a considerable workload in terms of production and verification leading to increased costs that do not seem to be justified. Others thought that, given the amount of data to be reported in each reporting period, more time should be given to allow institutions to prepare for the future reporting requirements.

Assessment. It is acknowledged that the increasing level of detail required has implications for the reporting burden. For this reason, the ECB completed a

comprehensive merits and costs exercise with a view to minimising the reporting burden on the reporting agents. As an outcome of this procedure, requirements for which the costs exceeded the merits have been removed from the reporting requirements before drafting the amending Regulation.⁷ In addition and also prior to the drafting of the amending Regulation, the user committee has been asked to reassess requirements on fraud reporting (see also assessment of 5.8). As a result, the amending Regulation includes only those data requirements for which the confirmed policy or operational necessity is strong enough to justify the set-up and regular costs. The new reporting requirements are essential for the performance of the ESCB tasks, and in particular for the smooth operation of payment systems in the EU, and help contribute to the smooth conduct of policies relating to the prudential supervision of credit institutions and the stability of the financial system. Statistical information on fraud is needed for the ECB to effectively perform its oversight tasks, for example by accurately monitoring trends in new payment services, formulating policies in rapidly evolving retail payment markets and assessing the degree of safety and efficiency of the payment instruments to mitigate the specific risks (e.g. financial and operational risks) relating to the individual payment schemes. Furthermore in order to ensure proportionality, subject to the discretion of the relevant NCB, reporting agents that have been granted derogations are to report statistical information in accordance with Tables 4b and 5b of Annex III as reflected in the revised text of the amending Regulation. Finally, the timeliness of reporting was assessed in the context of the merits and costs procedure; the assessment found that a balance between the users' needs for timely data and the corresponding costs to reporting agents has been achieved. Therefore, the timeliness requirements have not been amended at this stage.

5.3 Request to expand the reporting population

Comment. Two respondents requested a review of the scope of the reporting population to be addressed under the amending Regulation.

The most substantial comment was to include payment card schemes (PCS) in the reporting population as an alternative to placing an obligation on PSPs to report card payments data. This respondent was of the view that including PCS in the reporting population would increase the reliability of the oversight decisions taken by the ECB and the efficiency of data collection, as the PCS would report the data directly instead of the ECB collecting the same data via the PSPs. In addition, including PCS in the reporting population would alleviate the reporting burden on the PSPs.

Separately, one respondent suggested that independent ATM deployers (IADs) should be included in the reporting population due to their increasing presence in the ATM market.

⁷ e.g. reporting on payment transactions involving non-MFIs have been removed from the reporting and the relevant totals are now only required with a quarterly frequency to support economic forecasting

Assessment. Including PCS in the reporting population, regardless of whether these are licensed PSPs or not, entails several drawbacks. These drawbacks are presented below.

- Different level of information available and absence of methodological alignment: collecting data on card payments from PCS would lead to a loss of information necessary for the ECB to fulfil its oversight tasks. Many PCS do not have available the full range of information required under the amending Regulation (e.g. breakdown by authentication channel, breakdowns by fraud type) while this information should be available to PSPs, which are, contrary to PCS, legally obliged to avail of such information under PSD2 and report it under the EBA Guidelines. Therefore, PSPs would still have to report all the remaining requirements. Furthermore, it should be noted that by including PCS in the reporting population, PSPs, which would not report card payments data under the amending Regulation, would still need to report similar card payment data under the relevant EBA Guidelines as the EBA Guidelines do not include reporting by PCS which are non-PSPs. The ECB's experience with collecting and analysing data from PCS in the context of the production of its card fraud reports suggest that there are certain methodological discrepancies regarding data compilation and reporting between the PCS and the PSPs.
- Legal concerns: the Regulation can only address entities resident in the euro area Member States. As some international schemes and their governance authorities are legally located outside the euro area, the collection of data from PCS would need to be thoroughly examined from a legal point of view.
- Significant delay in the amendment of the Regulation: amending the scope of Article 2 of the Regulation is considered a significant change to the amending Regulation on which a public consultation was conducted. More specifically, the potential inclusion of PCS as reporting agents under the amending Regulation seems to be a material change which has not been subject to the merits and costs assessment and therefore could not have been publicly consulted. This would lead to a substantial delay in the revision of the amending Regulation.

While the inclusion of PCS in the reporting population might be beneficial in some ways, as the number of reporting agents might be reduced for the reporting of data on card payments, this benefit might be lost as the heterogeneous reporting from different sources (PCS and PSPs) will most likely create data consistency issues, which would have to be resolved by the NCBs requesting additional information from the reporting agents. This notwithstanding, the reporting of some (self-contained) information by PCS will be thoroughly examined and considered in the next update of the Regulation.

In relation to the suggestion to include IADs in the reporting population, it should be noted that in cases where an IAD is authorised to act as a PSP, it already is included in the reporting population. On the other hand, those IADs that are not authorised as PSPs are not included in the reference reporting population, as some are classified as non-financial corporations, and therefore legally cannot be required to report statistical data under the Regulation.

As a result, the amending Regulation does not include PCS in the reporting population if they are not licensed PSPs. However, as it is normal practice to regularly review statistical reporting requirements laid down in ECB Regulations, the possibility of including PCS in the reporting population will be further investigated in the next review.

5.4 Request for clarification and amendment of some aspects of the derogations regime

Comment. In their comments, 12 respondents asked for amendments and clarifications to Article 4 of the amending Regulation on the NCBs' discretion to grant derogations. Specifically, some respondents questioned the fairness of imposing a burden on institutions that are too large to benefit from derogations despite accounting for a small part of the retail payments market. A number of other respondents asked for more clarity on the conditions under which NCBs might grant derogations and the application of the 5% threshold. It was also unclear to some respondents whether institutions exempted or granted a waiver under PSD2 or Directive 2009/110/EC on the taking up, pursuit and prudential supervision of the business of electronic money⁸ (Electronic Money Directive, or EMD) should automatically be granted a derogation. Other respondents viewed the derogation regime as being too restrictive for NCBs, which should have more discretion to grant derogations.

Assessment. The Article on derogations has been reviewed to clarify the wording and remove any uncertainty for NCBs and reporting agents. In order to clarify the discretion available to NCBs when granting derogations, the Article has been amended to further explain the reporting requirements to which derogated institutions should be subject. Complementary information on the correct interpretation of the Article will be provided in the Manual on Payments Statistics.

5.5 Request for a reduction in the geographical detail to be reported

Comment. Several respondents expressed concern about the very detailed geographical breakdowns that would have to be provided, and these concerns were often linked to comments on the total amount of data to be reported and specifically on the multiplying effect of the Geo 3⁹ breakdowns for the majority of items and the Geo 6¹⁰ breakdowns to be reported quarterly. Many of the comments proposed that

⁸ Directive 2009/110/EC of the European Parliament and of the Council of 16 September 2009 on the taking up, pursuit and prudential supervision of the business of electronic money institutions amending Directives 2005/60/EC and 2006/48/EC and repealing Directive 2000/46/EC (OJ L 267, 10.10.2009, p.7).

⁹ A Geo 3 breakdown is a country level breakdown for each European Economic Area (EEA) country plus a rest-of-the-world aggregate.

¹⁰ A Geo 6 breakdown is a worldwide country level breakdown.

the geographical breakdown for those requirements that overlap with the requirements under the EBA Guidelines be reduced to a Geo 4¹¹ breakdown. In addition, some respondents specifically asked to reduce the level of geographical breakdowns of received transactions while others expressed concerns that the level of detail requested was greater than necessary to satisfy the purpose for which the statistics are reported. The quality of data that would be reported at the level of detail requested was also questioned.

Assessment. The geographical breakdowns were assessed extensively in the merits and costs procedure, during which reporting agents emphasised that a harmonisation of geographical breakdowns across tables would reduce the reporting burden and associated costs. This is an important principle underlying the proposed amendments. Nonetheless, when card payments are reported in Table 9 a harmonised geographical breakdown also makes it possible to fulfil several user needs with a single data collection. For example, a Geo 3 breakdown for received data supports monitoring cross-border trade.

Reporting agents that have been granted derogations in accordance with paragraphs 2 and 3 of Article 4 of the Regulation subject to the discretion of the relevant NCBs are to report statistical information in accordance with Tables 4b and 5b of Annex III on an annual basis with a half-yearly breakdown.

In order to accommodate, to the extent possible, the concerns expressed during the public consultation, the geographical breakdown in Table 8 of Annex III to the amending Regulation, which is to be reported by PSOs, is reduced to Geo 4 and Geo 1¹².

5.6 Request for reduced detail in reporting MCC

Comment. 14 respondents expressed concerns about the high level of granularity required for reporting MCC, particularly given the inconsistent application of these codes by different PCS. It was also noted that a one-to-one mapping with an international statistical classification (i.e. NACE codes) would not be possible. Some respondents also questioned the quality of the statistics that would be reported at the level of MCC coupled with the level of geographical detail required. Other respondents pointed out that the choice of MCC is not decided by the card-issuing institution, but rather by the PCS to which the merchant is attached, therefore questioning the definition of the MCC in Annex II to the amending Regulation, which refers to the ISO standard. Several respondents questioned the purpose of reporting MCC for domestic transactions for the analysis of cross-border trade in goods and services.

Assessment. It is worth remembering that according to part 2.8 of Annex I to the amending Regulation, MCC are to be reported only when already available to the

¹¹ A Geo 4 breakdown translates into 3 breakdowns: one for domestic transactions, one for cross-border transactions within the EEA and one for cross-border transactions outside the EEA.

¹² When reporting a Geo 1 breakdown, domestic and cross-border transactions are combined.

reporting agents. The fact that all MCC used in card schemes are consistent with the ISO standard does not mean that any PCS must include in its list all MCC in the standard. Nonetheless, the individual MCC for car rental agencies, airlines and hotels are not to be reported, but are instead merged into three separate generic categories for reporting purposes. This significantly reduces the number of MCC that would have to be reported and should reduce misalignments between codes used by different PCS. While further explanations on the reporting of MCC will be provided in the Manual on Payments Statistics, the ECB will additionally provide the NCBs with a comprehensive list of MCC.

5.7 Request to change some other payment breakdowns

Comment. Questions arose in respect of a number of other payments-related breakdowns. Some respondents questioned why the amending Regulation required the reporting of transactions that are outside the scope of PSD2. In particular, PSD2 excludes from its scope paper-based payments such as cheques, whereas the amending Regulation requires the reporting of all payment transactions involving non-MFIs. Some respondents cited a difficulty with distinguishing delayed debit card payments from credit card payments since the IFR does not differentiate between these transactions in terms of interchange fees. Other respondents raised the difficulties that some institutions might have in reporting certain breakdowns due to constraints arising from the specific role of the reporting agent in the transaction. This includes cases in which the institution receiving the transaction might not know what authentication method was used to initiate a payment, the exact nature of a card used in a transaction, or what steps are taken to verify a mandate for a direct debit it has received. In some cases, dependency on third parties or on the information available in payment files for the data that should be reported would mean that some breakdowns would be difficult to report. Some respondents questioned the merit of collecting statistics on received transactions when those same transactions would elsewhere be reported as sent transactions.

Assessment. In order to ensure a full picture of the retail payments landscape and to support the ESCB in the fulfilment of its tasks, payments services outside of the scope of PSD2, such as cheques, remain within the scope of the amending Regulation.

Regarding the manner in which delayed debit cards and credit cards are treated in the IFR, it should be noted that, while the IFR defines debit cards and credit cards, it recognises that two types of credit cards exist in the market: deferred (delayed) debit cards and other credit cards. This market reality is reflected by the inclusion of separate breakdowns for delayed debit cards and credit cards in the Regulation since 2013. Reporting on this basis will continue under the amending Regulation. Moreover, maintaining these breakdowns allows an alignment with the Bank for International Settlements' Red Book statistics, to which the ECB and several NCBs report payments statistics. In cases where a reporting agent cannot differentiate between a delayed debit card and a credit card, such a card is to be reported as a credit card. Therefore, delayed debit cards and credit cards, as well as transactions

with such cards, will continue to be reported separately; this does not hamper an alignment with the EBA Guidelines. The same logic applies to the reporting of the related transactions (see Part 2.3.1 of Annex I to the draft amending Regulation). Furthermore, regarding data broken down by payment scheme used to process a particular payment transaction, such information should always be available to the reporting agent (in its capacity as a scheme member).

5.8 Request to align reporting requirements with overlapping requirements to be reported under the EBA Guidelines

Comment. Several respondents commented on the statistical reporting requirements that overlap with the statistics to be reported under the EBA Guidelines. The respondents provided comments on the following.

- Legal basis: some respondents questioned whether the ECB has the mandate to collect statistics on fraud under Council Regulation (EC) No 2533/98.
- Limiting the requirements to those under the EBA Guidelines: a number of respondents requested that the breakdowns in the amending Regulation in respect of fraudulent payments, losses due to fraud and the authentication of payments that go beyond those requested in the EBA Guidelines be dropped, as they do not seem to be within the remit of the ECB's supervisory role.
- Manual and costly data collection: there are no automated processes in the collection of data on fraudulent payment transactions, which is why the reporting of fraud cases in the required depth requires complex manual processes. Some responses concerned the reporting institution's inability to access the requested information, for example how a cash withdrawal or a payment initiated by a PISP was authenticated. Some respondents also pointed out that whereas databases exist for payment data, there are currently no databases for fraud data, so these would have to be created.
- Classification of fraud is subjective and difficult: respondents pointed to the difficulties faced by a reporting institution to determine when fraud has taken place, with different processes leading to different levels of certainty, for example being notified by the victim as opposed to a police investigation leading to a conclusion of a court case. This uncertainty also affects the time it might take for a reporting institution to become aware of fraud, which leads to the question of when fraud should be reported.
- Aligning the format of the tables: it was requested that the requirements on fraud that overlap with the EBA Guidelines be presented in Annex III to the draft amending Regulation in the same way as in those Guidelines.
- Postponing the implementation: it was also argued that now is not the right time to go beyond the requirements introduced by the EBA Guidelines, since the reporting of data under those Guidelines has not yet been stabilised despite the costs incurred by reporting agents in developing systems to report those data,

with the knock-on effect that the usefulness of the reported data has not yet been thoroughly tested.

In addition, comments were also provided on specific breakdowns. Respondents asked the following:

- that fraud types for direct debit fraud be aligned with the fraud types for direct debit fraud under the EBA Guidelines;
- that breakdowns connected to strong customer authentication be limited to those required under the EBA Guidelines;
- that the reporting of received fraudulent payment transactions be removed from the amending Regulation;
- that the geographical breakdowns in the amending Regulation be aligned with those of the EBA Guidelines for the reporting of fraudulent payment transactions.

Assessment. It is recognised that the breakdowns in the amending Regulation go beyond the EBA Guidelines, with the inclusion of scheme breakdowns, breakdowns by new initiation channels and a greater level of geographical detail. These are included to satisfy the needs of the overseers of payment instruments, schemes and systems, namely to (i) promote the safety and efficiency of payment, clearing and settlement systems, (ii) maintain confidence in the euro and (iii) promote an efficient economy. The needs for payment fraud statistics from an oversight perspective go beyond the supervisory needs addressed in the EBA Guidelines, requiring more detailed data in order to fulfil the overseers' tasks. It is on that legal basis that the Eurosystem, in its statutory role as overseer of payment instruments and schemes, requires the reporting of these more detailed statistics in order to be able to monitor the evolution of payment fraud and so to ensure a high degree of payments security and ultimately to maintain confidence in the euro and promote an efficient economy. More specifically, this additional detail is needed given that (i) different payment schemes operating in the euro area are overseen by different Eurosystem central banks and a number of payment schemes operate cross-border (this pattern is likely to expand further with the increase of e-commerce); (ii) payment schemes have different functions, rules and procedures, which require individual monitoring from an oversight point of view; and (iii) country-specific fraud patterns become more evident when a more detailed country-based reporting is provided. It should also be noted that the reporting requirements have been significantly reduced following a user reassessment as a result of the merits and costs procedure and before drafting the amending Regulation. Reporting requirements for which the costs exceeded the merits have been dropped and the reporting requirements have been simplified by removing the level of detail requested in the amending Regulation.¹³

¹³ For example, in the merits and costs procedure, the authentication via (non-)strong customer authentication was reported broken down by card scheme, which itself was reported broken down by card function. The authentication via (non-)strong customer authentication is now only required with a scheme breakdown.

As regards the legal basis for the ESCB to collect statistical information, Article 5 of Protocol (No 4) on the Statute of the ESCB and of the ECB requires the ECB to collect the statistical information necessary to carry out the tasks entrusted to the ESCB.

As indicated in the recitals of the amending Regulation, it is necessary to ensure that the statistical information on fraudulent payments available to the ECB allows it to effectively perform its oversight tasks¹⁴, which cover, for example, overseeing individual payment schemes by accurately monitoring trends in new payment services, formulating policies in rapidly evolving retail payment markets and assessing the degree of safety and efficiency of the payment instruments to mitigate the specific risks (e.g. financial and operational risks) relating to the overseen payment schemes. The fraud data reporting under PSD2 via the accompanying EBA Guidelines focuses on the reporting of fraud data that are relevant mostly for supervisory purposes, and hence does not require reporting of information on individual schemes and payment initiation, which is why a more detailed reporting of information on fraud is required for the fulfilment of the ECB's tasks.

Nevertheless, as indicated in the recitals of the amending Regulation, in line with the principle of proportionality, NCBs are allowed to collect the necessary statistical information on fraud via the relevant NCA that already collects data from the reporting agents, in accordance with local cooperation arrangements. Equally, it is possible for an NCB to transmit the confidential statistical information on fraud collected under the Regulation to its domestic NCA to facilitate data collection by that NCA under PSD2, provided that the rules for the protection and use of confidential statistical information in Council Regulation (EC) No 2533/98 are followed.

It should be noted that the aspects relating to the implementation period have been assessed in Section 5.1. Furthermore, concerning the request to align the reporting tables, such an alignment would not be practical given the differences between the data requirements. It should also be noted that further guidance on the reporting will be provided in the Manual on Payments Statistics in order to ensure that the reporting is harmonised across countries. In order to accommodate to the extent possible the comments received, the following changes have been made to the amending Regulation.

- In order to align the fraud types for direct debits with those required under the EBA Guidelines, the fraud types “mandate inexistence/invalidity” and “manipulation of the mandate” have been merged into a single breakdown referring to “unauthorised payment transaction”.
- The authentication channels breakdown for cash withdrawals using card-based payment instruments has been removed from the amending Regulation. However, it has not been removed for transactions initiated by PISP as such a removal would lead to a misalignment with the EBA Guidelines.

¹⁴ Such as promoting the safety and efficiency of payment, clearing and settlement systems as well as maintaining confidence in the euro.

- The scheme breakdown, sub-breakdowns by card function and by authentication channel will remain in the amending Regulation as this information is highly relevant from the oversight perspective, in order to monitor compliance of the payment schemes with payment security requirements. In particular, keeping the links with card function and the fraud type breakdowns would also preserve the continuity of the current reporting practices associated with the production of the ECB's card fraud reports. Otherwise such data would have to be reported additionally by PCS under the current reporting framework for the ECB's card fraud report, which in the end would collect the information from PSPs, leading to somewhat duplicative reporting practices. However, the breakdown "Reason for non-SCA¹⁵" is proposed to be excluded from the scheme breakdowns and is only reported in the sections covering remotely and non-remotely initiated transactions authenticated via non-SCA.
- Received fraudulent payment transactions, with the exception of card payments received, have been removed from reporting to further reduce the reporting burden and align with the EBA Guidelines.

5.9 Requests in respect of definitions

Comment. Four respondents requested that definitions be exactly aligned with existing definitions in other legislation on payments, specifically referring to PSD2 and the IFR. Several suggestions on providing further clarification on the interpretation of definitions were received, as the relationship between different breakdowns is unclear (e.g. mobile payment solution and e-commerce or credit transfer and e-money payment transactions). There were also requests for definitions to be provided even when linked to items that are already reported under the Regulation, such as large-value payment systems, acquiring payment transactions, original unit and payments system operator. Some definitions introduced with the new reporting requirements, such as fraud reporting, were also questioned, examples being the definition of 'card details theft' and 'merchant initiated transaction'.

Assessment. To better align those definitions with existing definitions in other European legislation and to ensure consistent reporting, the definitions and the methodology laid down in Regulation (EU) No 1409/2013 of the ECB are now updated to be better aligned with the definitions and methodology laid down in PSD2, Regulation (EU) 549/2013 of the European Parliament and of the Council and the IFR, as far as applicable for the purposes of ESCB tasks. Accordingly, Annex II to the amending Regulation has been reviewed following the public consultation and definitions have been further aligned with existing legislation. However, statistical needs sometimes required deviation from definitions in other pieces of legislation. It is also important to provide additional explanations as to how items defined in other pieces of legislation should be reported. For this reason a Manual on Payments Statistics for reporting agents and NCBs is being prepared to provide further

¹⁵ SCA means Strong Customer Authentication as defined under PSD2.

explanations where necessary. Regarding concepts for which no definition is available in any other legal act, a definition was provided in the amending Regulation to ensure a harmonised understanding of the statistics to be reported across countries.

5.10 Other comments

Comment. Some respondents requested further clarity about who should report breakdowns connected to the business of AISPs. Other respondents sought clarity about how methodological aspects, such as various breakdowns concerning e-money payments, or cross-border card-based payment transactions should be understood. Clarification was also sought on a number of further issues such as what institutions are included in 'other payment service providers', and who should report data in the tables that are to be reported by payment system operators rather than PSPs.

Assessment. The Annexes to the amending Regulation have been amended in order to address unclear issues. Regarding the reporting of cross-border card-based payment transactions, the Annexes have been amended to clarify the definition in Annex II which explains that both the counterpart residency and the location of the point of sale are relevant in order to determine whether a card-based payment transaction is cross-border or not and that therefore, the counterpart residency and the location of the point of sale should be reported together for the semi-annual reporting. This has now been reflected in recital 4 of the Regulation and Annex II. All other aspects will be further clarified in the forthcoming Manual on Payments Statistics.

6 Amendments made to the draft Regulation following consultation

Following the ECB's assessment of the outcome of the public consultation and the response from the European Commission (which was also formally consulted), amendments were incorporated into the amending Regulation before its adoption by the Governing Council of the ECB on 1 December 2020. Table 2 explains those amendments. Purely editorial changes are not listed.

Table 2
Amendments to the draft amending Regulation following consultation

Recitals	Heading	Amendment
Recital 2	Reporting frequency	Clarification on reporting frequencies.
Recital 4	Reporting of fraud data	Cross-border card-based payment transactions were included.
Recital 5	Definitions and methodology	Amended to better explain how the Regulation is aligned with PSD2 and other legislation.
Recital 6	Inclusion of payment institutions newly authorised under PSD2	Minor clarification on methodological alignment.
Recital 7	Statistics on cross-border trade	Amended to better explain the need for balance of payments statistics, in particular Merchant Category Codes (MCC).
Recital 9	Derogations	Amended to further clarify the scope of NCBs' discretion to grant derogations and to explain the possibilities for data sharing between national authorities.

Articles	Heading	Amendment
Article 1	Definitions	Updated to include 'payment transaction' and to expand the definition of 'payment service'. Necessary changes were reflected in the Annexes.
Article 2	Actual reporting population	Included to clarify what constitutes 'actual reporting population'.
Article 3	Statistical reporting requirements	Updated to clarify the reporting population that is addressed.
Article 4	Derogations	Extensively rewritten to improve clarity and certainty on the circumstances in which NCBs may grant derogations.
Article 6	Timeliness	The sequence has been rearranged and reporting frequencies have been linked to the corresponding tables.
Article 8	First reporting	A new sub-Article 8a has been added and the first reporting dates under the amending Regulation are given there.

Annex I	Heading	Amendment
Part 1.1.1	Overview of tables	Updated to explain which tables should be reported by (i) payment service providers and (ii) payment system operators. In addition, this subsection has been updated to better explain how derogations can be granted in respect of the reporting tables.
Part 1.1.1	Table 1	Clarification on reporting statistics on AISPs.
Part 1.1.1	Table 2	Minor change in terminology.
Part 1.1.1	Table 3	Minor change in terminology.
Part 1.1.1	Table 4a	Minor editing change.
Part 1.1.1	Table 4b	Minor amendment to refer to the correct numbering of Article 4.
Part 1.1.1	Table 5a	Minor clarification.
Part 1.1.1	Table 5b	Updated in order to correctly reflect the structure of Table 5b, following changes to reduce the reporting burden.
Part 1.3	Consolidation within the same national territory	Clarification on the reporting population.
Part 2.1.2	Payment card functions (Table 2)	Amended to clarify terms related to card payments.
Part 2.1.3 (new)	Payment card functions (Table 2)	Clarification on reporting delayed debit cards.
Part 2.1.6 (b) (previously 2.1.5 (b))	Payment card functions (Table 2)	Minor change in terminology.
Part 2.2.1	Payment card accepting devices (Table 3)	Minor clarification.
Part 2.2.5	Payment card accepting devices (Table 3)	Minor change in terminology.
Part 2.3.1	Payment transactions involving non-MFIs (Tables 4a and 4b)	Sub-header updated in order to remove an unnecessary reference to the derogations.
Part 2.3.1.2	Payment transactions involving non-MFIs (Tables 4a and 4b)	Minor clarification of terminology.
Part 2.3.1.8	Payment transactions involving non-MFIs (Tables 4a and 4b)	Minor clarification.
Parts 2.3.1.9 - 2.3.1.12	Cross-border transactions	The section 'Cross-border transactions', which included parts 2.3.1.9 (previously 2.3.1.63), 2.3.1.10 (previously 2.3.1.64) and 2.3.1.12 (previously 2.3.1.65), has been moved from the penultimate subsection of Part 2.3.1 so that it now precedes the sections covering specific payment services. In addition, a new subsection (part 2.3.1.11) has now been added to explain the special case of card-based payment transactions.
Parts 2.3.1.13a - 2.3.1.13c	Flow of funds	The section 'Flow of funds', which included parts 2.3.1.13a (previously 2.3.1.66a), 2.3.1.13b (previously 2.3.1.66b) and 2.3.1.13c (previously 2.3.1.66c), has been moved from the concluding subsection of Part 2.3.1 so that it now precedes the sections covering specific payment services.
Part 2.3.1.14 (previously 2.3.1.9)	Total payment transactions	Updated to better explain what is included in the indicator 'total payment transactions' for sent and received transactions.
Part 2.3.1.15 (previously 2.3.1.10):	Credit transfers	Minor editorial change.
Part 2.3.1.16 (previously 2.3.1.11)	Credit transfers	Minor editorial change.
Part 2.3.1.18 (previously 2.3.1.13)	Credit transfers	Amended to include a clarification in respect of reporting transactions at ATMs and POS terminals.
Part 2.3.1.22 (previously 2.3.1.17)	Credit transfers	Minor change in terminology.
Part 2.3.1.23 (previously 2.3.1.18)	Credit transfers	Minor clarification.
Part 2.3.1.24 (previously 2.3.1.19)	Credit transfers	Minor editorial change.
Part 2.3.1.25 (previously 2.3.1.20)	Credit transfers	Amended to account for the change when reporting transactions authenticated via non-SCA.
Part 2.3.1.26 (previously 2.3.1.21)	Credit transfers	Amended to explain how transactions broken down by scheme should be reported.
Part 2.3.1.27 (previously 2.3.1.22)	Credit transfers	Minor editorial change.

Annex I	Heading	Amendment
Part 2.3.1.31 (previously 2.3.1.26)	Direct debits	Minor change in terminology.
Part 2.3.1.33 (previously 2.3.1.28)	Direct debits	Minor editorial change.
Part 2.3.1.35 (previously 2.3.1.30)	Direct debits	Detail added to better explain that reporting for each scheme should take place separately.
Header: 'Card-based payment transactions'	Card-based payment transactions	Header: 'Card Payments' updated to 'Card-based payment transactions'.
Part 2.3.1.37 (previously 2.3.1.32)	Card-based payment transactions	Amended to clarify the terms related to card-based transactions.
Part 2.3.1.38 (previously 2.3.1.33)	Card-based payment transactions	Amended to clarify the terms related to card-based transactions.
Part 2.3.1.39 (previously 2.3.1.34)	Card-based payment transactions	Amended to clarify the terms related to card-based payment transactions and to align with the terminology in Annex III.
Part 2.3.1.40 (previously 2.3.1.35)	Card-based payment transactions	Amended to clarify the terms related to card-based transactions.
Part 2.3.1.41 (previously 2.3.1.36)	Card-based payment transactions	Amended to include a clarification in respect of reporting transactions at ATMs and POS terminals and how mobile payments should be reported.
Part 2.3.1.42 (previously 2.3.1.37)	Card-based payment transactions	Amended to clarify the terms related to card-based transactions.
Part 2.3.1.43 (previously 2.3.1.38)	Card-based payment transactions	Amended to clarify terms related to card-based payment transactions. Minor editorial change.
Part 2.3.1.44 (new subsection)	Card-based payment transactions	Added to explain the equivalence of different breakdowns of card payments.
Part 2.3.1.45 (previously 2.3.1.39)	Card-based payment transactions	Amended to explain how reasons for using non-SCA should be reported.
Previously part 2.3.1.40	Card-based payment transactions	Sentence moved to Section 2.1.
Part 2.3.1.46 (previously 2.3.1.41)	Card-based payment transactions	Amended to clarify terms related to card-based payment transactions.
Header: Cash withdrawals using card-based payment instruments (except e-money transactions)	Cash withdrawals using card-based payment instruments (except e-money transactions)	Changed from 'Cash withdrawals' to 'Cash withdrawals using card-based payment instruments (except e-money transactions)'.
Part 2.3.1.47 (new section)	Cash withdrawals using card-based payment instruments (except e-money transactions)	Added to better explain which cash withdrawals should be reported.
Part 2.3.1.48 (previously 2.3.1.42)	Cash withdrawals using card-based payment instruments (except e-money transactions)	Updated to better explain how card scheme breakdowns relate to card function breakdowns.
Previously part 2.3.1.43	Cash withdrawals using card-based payment instruments (except e-money transactions)	Moved to the new shorter subsection part 2.3.1.48.
Part 2.3.1.50 (previously 2.3.1.45)	E-money payment transactions	Minor editorial change.
Previously part 2.3.1.47	E-money payment transactions	Moved to subsection part 2.3.1.50.
Part 2.3.1.52 (previously 2.3.1.48)	E-money payment transactions	Updated to clarify the breakdowns that should be reported for e-money transactions.
Part 2.3.1.53 (previously 2.3.1.49)	E-money payment transactions	Minor editorial change.
Part 2.3.1.61 (previously 2.3.1.57)	Other payment services	Updated to clarify the breakdowns that should be reported for 'Other payment services'.
Part 2.3.1.62 (previously 2.3.1.58)	Payment initiation services	Updated to clarify the breakdowns connected to payment initiation services that should be reported.
Parts 2.3.1.63 -2.3.1.65	Cross-border transactions	The section 'Cross-border transactions', which included parts 2.3.1.63 (now 2.3.1.9), 2.3.1.64 (now 2.3.1.10) and 2.3.1.65 (now 2.3.1.12), has been moved to the beginning of Part 2.3.1, which explains general methodological aspects.

Annex I	Heading	Amendment
Parts 2.3.1.66a - 2.3.1.66c	Flow of funds	The section 'Flow of funds', which included parts 2.3.1.66a (now 2.3.1.13a), 2.3.1.66b (now 2.3.1.13b) and 2.3.1.66c (now 2.3.1.13c), has been moved to the beginning of Part 2.3.1, which explains general methodological aspects.
Header Part 2.3.2:	Payment transactions involving non-MFIs reported by those reporting agents granted derogation pursuant to Article 4(2) and (3) (Table 4b)	The header for Part 2.3.2 has been slightly amended to refer to the correct numbering of Article 4. In addition, an incorrect reference to Table 4a has been updated to correctly reference Table 4b.
Part 2.3.2.2	Payment transactions involving non-MFIs reported by those reporting agents granted derogation pursuant to Article 4(2) and (3) (Table 4b)	Editorial change.
2.3.2.8 -2.3.2.11	Cross-border transactions	The section 'Cross-border transactions', which included parts 2.3.2.8 (previously 2.3.2.38), 2.3.2.9 (previously 2.3.2.39) and 2.3.2.11 (previously 2.3.2.40) has been moved from the penultimate subsection of Part 2.3.2 so that it now precedes the sections covering specific payment services. In addition, a new subsection (part 2.3.2.10) has now been added to explain the special case of card-based payment transactions.
2.3.2.12d - 2.3.2.12f	Flow of funds	The section 'Flow of funds', which included parts 2.3.2.12d (previously 2.3.2.41d), 2.3.2.12e (previously 2.3.2.41e) and 2.3.2.12f (previously 2.3.2.41f), has been moved from the concluding subsection of Part 2.3.2 so that it now precedes the sections covering specific payment services.
Part 2.3.2.14 (previously 2.3.2.9):	Credit transfers	Minor editorial change.
Part 2.3.2.17 (previously 2.3.2.12)	Credit transfers	Updated as reporting by scheme breakdown is not required.
Part 2.3.2.18 (previously 2.3.2.13)	Credit transfers	Updated to better explain the breakdowns for reporting credit transfers.
Part 2.3.2.19 (previously 2.3.2.14)	Credit transfers	The breakdowns for 'authenticated by non-SCA' no longer include the sub-category 'other'.
Part 2.3.1.23 (previously 2.3.1.18)	Direct debits	Minor change in terminology.
Part 2.3.2.24 (previously 2.3.2.19)	Direct debits	Updated to remove a reference to scheme breakdowns.
Part 2.3.2.25 (previously 2.3.2.20)	Direct debits	Updated to remove a reference to scheme breakdowns.
Header: 'Card-based payment transactions'	Card-based payment transactions	The header 'Card payments' was updated to 'Card-based payment transactions'.
Part 2.3.2.27 (previously 2.3.2.22)	Card-based payment transactions	Amended to clarify terms related to card-based payment transactions.
Part 2.3.2.28 (previously 2.3.2.23)	Card-based payment transactions	Amended to clarify terms related to card-based payment transactions.
Part 2.3.2.29 (previously 2.3.2.24)	Card-based payment transactions	Amended to clarify terms related to card-based payment transactions and to align with the terminology in Annex III.
Part 2.3.2.30 (previously 2.3.2.25)	Card-based payment transactions	Amended to clarify terms related to card-based payment instruments and card-based payment transactions.
Part 2.3.2.31 (previously 2.3.2.26)	Card-based payment transactions	Amended to clarify terms related to card-based payment instruments and card-based payment transactions.
Part 2.3.2.32 (previously 2.3.2.27)	Card-based payment transactions	Amended to clarify terms related to card-based payment transactions.
Part 2.3.2.33 (previously 2.3.2.28)	Card-based payment transactions	Amended to clarify terms related to card-based payment instruments and card-based payment transactions.
Header: Cash withdrawals using card-based payment instruments (except e-money transactions)	Cash withdrawals using card-based payment instruments (except e-money transactions)	Header 'Cash withdrawals' updated to 'Cash withdrawals using card-based payment instrument (excluding e-money transactions)'.
Part 2.3.2.34 (new subsection)	Cash withdrawals using card-based payment instruments (except e-money transactions)	Included to explain the scope of cash withdrawals.
Part 2.3.2.30	Cash withdrawals using card-based payment instruments (except e-money transactions)	This subsection has been deleted because the breakdown between SCA and non-SCA should no longer be reported following the public consultation.

Annex I	Heading	Amendment
Part 2.3.2.35 (previously part 2.3.2.30)	Cash withdrawals using card-based payment instruments (except e-money transactions)	Minor change in terminology.
Part 2.3.2.36 (previously 2.3.2.31)	E-money payment transactions	Updated to add a reference to remote and non-remote breakdowns.
Part 2.3.2.37 (previously 2.3.2.32)	E-money payment transactions	Editorial changes.
Part 2.3.2.38 (previously 2.3.2.33)	Money remittances	Updated to clarify that received money remittances should no longer be reported.
Part 2.3.2.40 (previously 2.3.2.35)	Payment initiation services	Updated to add a reference to remote and non-remote breakdowns.
Part 2.3.2.41 (previously 2.3.2.36)	Payment initiation services	Minor editorial change.
Parts 2.3.2.38 -2.3.1.40	Cross-border transactions	The section 'Cross-border transactions', which included parts 2.3.2.38 (now 2.3.1.8), 2.3.2.39 (now 2.3.1.9) and 2.3.1.40 (now 2.3.1.11), has been moved to the beginning of Part 2.3.2, which explains general methodological aspects.
2.3.2.41d -2.3.1.41f	Flow of funds	The section on 'Flow of funds', which included parts 2.3.2.41d (now 2.3.1.12a), 2.3.1.41e (now 2.3.1.12b) and 2.3.1.41f (now 2.3.1.12c), has been moved to the beginning of Part 2.3.2, which explains general methodological aspects.
Sub-header Part 2.4.1:	Fraudulent payment transactions involving non-MFIs (Table 5a)	Updated in order to remove an unnecessary reference to the derogations.
Part 2.4.1.1	Fraudulent payment transactions involving non-MFIs (Table 5a)	In order to reduce the reporting burden, reporting received fraudulent transactions is no longer required.
Part 2.4.1.2	Fraudulent payment transactions involving non-MFIs (Table 5a)	Updated to clarify when fraud should be reported.
Part 2.4.1.3 (previously 2.4.1.2)	Fraudulent payment transactions involving non-MFIs (Table 5a)	Updated to include fraudulent cash withdrawals.
Part 2.4.1.6 (new subsection)	Fraudulent payment transactions involving non-MFIs (Table 5a)	Added to clarify the relationship between 'losses due to fraud per liability bearer' and 'total fraud'.
Part 2.4.1.7 (previously part 2.4.1.5)	Fraudulent credit transfers	Clarification on breakdowns for fraudulent credit transfers initiated electronically.
Part 2.4.1.8 (previously part 2.4.1.6)	Fraudulent credit transfers	Updated to clarify that this section concerns fraud origin and its breakdowns.
Part 2.4.1.9 (previously part 2.4.1.7)	Fraudulent credit transfers	Updated to clarify that this section concerns fraudulent credit transfers.
Part 2.4.1.10 (previously 2.4.1.8)	Fraudulent direct debits	Updated to replace the breakdowns 'mandate inexistence/invalidity' and 'manipulation of the mandate' with the breakdown 'unauthorised payment transaction' because of the difficulty with reporting those breakdowns.
Part 2.4.1.12 (previously 2.4.1.10)	Fraudulent direct debits	Updated to clarify that the requirements specified here apply to fraudulent direct debits.
Header: Fraudulent card-based payment transactions	Fraudulent card-based payment transactions	Header 'Fraudulent card payments' replaced with 'Fraudulent card-based payment transactions'.
Part 2.4.1.13 (previously 2.4.1.11)	Fraudulent card-based payment transactions	Amended to clarify terms related to card-based payment transactions.
Part 2.4.1.14 (previously 2.4.1.12)	Fraudulent card-based payment transactions	Minor editorial change.
Part 2.4.1.15 (previously 2.4.1.13)	Fraudulent card-based payment transactions	Minor editorial change.
Header: Fraudulent cash withdrawals using card-based payment instruments (except e-money transactions)	Fraudulent cash withdrawals using card-based payment instruments (except e-money transactions)	Header 'Fraudulent cash withdrawals' updated to 'Fraudulent cash withdrawals using card-based payment instruments (except e-money transactions)' to align with Annex III.
Part 2.4.1.16 (previously 2.4.1.14 - 16)	Fraudulent cash withdrawals using card-based payment instruments (except e-money transactions)	Minor editorial change. The breakdowns by authentication method are no longer required.

Annex I	Heading	Amendment
Part 2.4.1.18	Fraudulent e-money payment transactions	Updated to clarify the breakdowns that should be reported for fraud origins.
Previously part 2.4.1.20 (removed)	Payment initiation services	Following the public consultation, breakdowns on fraudulent payments initiated by PISPs have been removed.
Header: Part 2.4.2	Fraudulent payment transactions involving non-MFIs reported by those reporting agents granted a derogation pursuant to Article 4(2) and (3) (Table 5b)	Minor amendment to refer to the correct numbering of Article 4. In addition, the reference to Table 5a has been updated to correctly refer to Table 5b.
Part 2.4.2.1	Fraudulent payment transactions involving non-MFIs reported by those reporting agents granted a derogation pursuant to Article 4(2) and (3) (Table 5b)	Minor editorial change.
Part 2.4.2.2 (new subsection)	Fraudulent payment transactions involving non-MFIs reported by those reporting agents granted a derogation pursuant to Article 4(2) and (3) (Table 5b)	Added to clarify when fraud should be reported.
Part 2.4.2.3 (previously part 2.4.2.2)	Fraudulent payment transactions involving non-MFIs reported by those reporting agents granted a derogation pursuant to Article 4(2) and (3) (Table 5b)	Editorial change and updated to include fraudulent cash withdrawals.
Part 2.4.2.6 (new section)	Fraudulent payment transactions involving non-MFIs reported by those reporting agents granted a derogation pursuant to Article 4(2) and (3) (Table 5b)	Section added to clarify that 'losses due to fraud per liability bearer' do not necessarily correspond to the fraudulent transactions reported in the same reporting period.
Part 2.4.2.7 (previously 2.4.2.5)	Fraudulent credit transfers	Minor editorial change.
Part 2.4.2.8 (previously 2.4.2.6)	Fraudulent credit transfers	Updated to clarify that this section concerns fraud origin breakdowns.
Part 2.4.2.9 (previously 2.4.2.7)	Fraudulent credit transfers	Updated to clarify that this section concerns fraudulent credit transfers.
Part 2.4.2.10 (previously 2.4.2.8)	Fraudulent direct debits	Updated to replace the breakdowns 'mandate inexistence/invalidity' and 'manipulation of the mandate' with the breakdown 'unauthorised payment transaction' because of the difficulty with reporting those breakdowns.
Part 2.4.2.12 (previously 2.4.2.10)	Fraudulent direct debits	Updated to clarify that this section concerns fraudulent direct debits.
Header: Fraudulent card-based payment transactions	Fraudulent card-based payment transactions	Header 'Fraudulent card payments' updated to 'Fraudulent card-based payment transactions'.
Part 2.4.2.13 (previously part 2.4.2.11)	Fraudulent card-based payment transactions	Amended to clarify terms related to fraudulent card-based payment transactions.
Part 2.4.1.15 (previously part 2.4.1.13)	Fraudulent card-based payment transactions	Amended to clarify terms related to fraudulent card-based payment transactions.
Header: Fraudulent cash withdrawals using card-based payment instruments (except e-money transactions)	Fraudulent cash withdrawals using card-based payment instruments (except e-money transactions)	Header 'Fraudulent cash withdrawals' updated to 'Fraudulent cash withdrawals using card-based payment instruments (except e-money transactions)' to align with Annex III.
Part 2.4.2.16 (previously part 2.4.2.14)	Fraudulent cash withdrawals using card-based payment instruments (except e-money transactions)	Minor editorial change.
Part 2.4.2.18 (previously part 2.4.2.16)	Fraudulent cash withdrawals using card-based payment instruments (except e-money transactions)	Minor editorial change.
Part 2.4.2.19 (previously part 2.4.2.17)	Fraudulent e-money payment transactions	Updated to clarify the breakdowns that should be reported for fraud origin for e-money payment transactions.
Part 2.4.2.20 (previously part 2.4.2.18)	Fraudulent e-money payment transactions	Minor editorial change.

Annex I	Heading	Amendment
Previously part 2.4.2.20 (removed)	Fraudulent e-money payment transactions	Breakdowns on fraudulent payments initiated by PISPs have been removed.
Part 2.5.8	Payment transactions per type of terminal involving non-MFIs (Table 6)	Minor editorial change.
Part 2.6.1	Participation in selected payment systems (Table 7)	Updated in order to clarify that this table is to be reported by payment system operators.
Part 2.7.1	Payments processed by selected payment systems (Table 8)	Updated in order to clarify that this table is to be reported by payment system operators.
Part 2.7.10 (previously 2.7.11)	Payments processed by selected payment systems (Table 8)	Amended to clarify terms related to card-based payment instruments.
Header: Part 2.8	Card-based payment transactions	Header 'Card payments' updated to 'Card-based payment transactions'.
Part 2.8.1	Card-based payment transactions	Amended to clarify that in Table 9 card-based payment transactions should be reported by the sender with a Geo 6 breakdown based on the location of the point of sale.
Part 2.8.2	Card-based payment transactions	Amended to clarify terms related to card-based payment instruments and card-based payment transactions.
Part 2.8.3	Card-based payment transactions	Amended to clarify terms related to card-based payment instruments and card-based payment transactions.
Part 2.8.4	Card-based payment transactions	Amended to clarify terms related to card-based payment instruments and card-based payment transactions.
Part 2.8.5	Card-based payment transactions	Amended to clarify terms related to card-based payment instruments and card-based payment transactions.

Annex II	Heading	Amendment
Data Definitions	Acquirer	Updated to align with the definition in the IFR.
Data Definitions	Automated teller machine (ATM)	Minor editorial changes.
Data Definitions	ATM cash deposit (except e-money transactions)	Minor editorial changes.
Data Definitions	ATM cash withdrawal (except e-money transactions)	Minor editorial changes.
Data Definitions	ATM transaction (except e-money transactions)	Minor editorial changes.
Data Definitions	ATM with a cash withdrawal function	Minor editorial changes.
Data Definitions	ATM with a credit transfer function	Minor editorial changes.
Data Definitions	Authentication (new definition)	New definition aligned with the definition in PSD2.
Data Definitions	Card-based payment instrument	Updated to align with the definition in the IFR and to add clarity on reporting under the amending Regulation.
Data Definitions	Card details theft	Updated to align with the definition of 'sensitive payment data' in PSD2.
Data Definitions	Card issuer	Updated to align with the definition in the IFR.
Data Definitions	Card not received	Minor editorial change.
Data Definitions	Card-based payment transactions initiated at a physical electronic funds transfer at point of sale (EFTPOS)	Updated to align with terminology in the IFR.
Data Definitions	Card-based payment transactions with card-based payment instruments issued by resident PSP initiated electronically	Updated to align with terminology in the IFR.
Data Definitions	Card-based payment transactions with card-based payment instruments issued by resident PSPs (except cards with an e-money function only)	Updated to align with terminology in the IFR.
Data Definitions	Card-based payment transactions with card-based payment instruments issued by resident PSPs initiated non-electronically	Updated to align with terminology in the IFR.
Data Definitions	Card-based payment transactions with card-based payment instruments issued by resident PSPs initiated electronically via remote payment channel	Updated to align with terminology in the IFR and to remove additional explanatory detail.
Data Definitions	Card-based payment transactions with card-based payment instruments issued by resident PSPs initiated non-electronically via remote payment channel	Updated to align with terminology in the IFR and to remove additional explanatory detail.
Data Definitions	Card-based payment transactions	Updated to align with the definition in the IFR and to add clarity on reporting under the amending Regulation.
Data Definitions	Credit card (previously 'Card with a credit function')	Updated to align with the definition in the IFR, although excluding delayed debit cards.
Data definitions	Cross-border payment transaction	A new footnote is added to explain how cross-border card-based payment transactions should be reported.
Data Definitions	Debit card (previously 'Card with a debit function')	Updated to align with the definition in the IFR.
Data Definitions	Delayed debit card (previously 'Card with a delayed debit function')	No change to the definition.
Data Definitions	Card-based payment transaction (previously 'card payment')	Updated to align with the definition in the IFR, except in that it adds delayed debit cards to the list of card types mentioned in that definition.
Data Definitions	Card-based payment instrument issuing services	Definition removed.
Data Definitions	Cash advance at POS terminals	Minor editorial change.
Data Definitions	Cash withdrawal using card-based payment instruments (except e-money transactions)	Minor change in terminology and updated to clarify what should be reported for this breakdown.
Data Definitions	Central bank	Updated to align with ESA 2010.

Annex II	Heading	Amendment
Data Definitions	Cheque	Minor editorial change.
Data Definitions	Consent given via an electronic mandate	Updated to align with the SEPA Regulation.
Data Definitions	Contactless low value	Minor editorial change.
Data Definitions	Counterfeit card	Minor change in terminology.
Data Definitions	Counterfeit e-money card	Minor change in terminology.
Data Definitions	Credit institution legally incorporated in the reporting country	Definition replaced with a definition of credit institution and the alignment with ESA 2010 remains.
Data Definitions	Credit transfer initiated by PISP	Removed.
Data Definitions	Credit transfers of which: non-SEPA	Removed.
Data Definitions	Credit transfer initiated in paper-based form	Minor editorial change.
Data Definitions	Credit transfer payment scheme	Minor editorial change.
Data Definitions	Cross-border transaction	Minor editorial change.
Data Definitions	Digital wallet	The definition has been removed as the term is not used in the Regulation or Annexes.
Data Definitions	Direct debit initiated in a file/batch	Minor editorial change.
Data Definitions	Direct debits of which: non-SEPA	Removed.
Data Definitions	Direct debit payment scheme	Minor editorial change.
Data Definitions	E-money account	Minor editorial change.
Data Definitions	E-money card not received	Minor editorial change.
Data Definitions	E-money card terminal	Updated to clarify the functional capacity of e-money terminals.
Data Definitions	E-money card-loading and unloading terminal	Minor editorial change.
Data Definitions	E-money card-loading and unloading	Minor editorial change.
Data Definitions	E-money payment transaction	Updated to reference the definition of e-money in the amending Regulation.
Data Definitions	E-money scheme	Removed.
Data Definitions	Fraudulent payment transaction	Updated to add a reference to the EBA Guidelines.
Data Definitions	Institutions offering payment services to non-MFIs	A reference to Annex III removed.
Data Definitions	Interchange fee	Minor editorial change.
Data Definitions	Issuance of a payment order by the fraudster	Minor editorial changes.
Data Definitions	Large-value payment system (LVPS) (new definition)	Updated to align with the SEPA Regulation.
Data Definitions	Losses due to fraud per liability bearer	Updated to add a reference to the EBA Guidelines.
Data Definitions	Lost or stolen card	Updated to link with fraud conducted with a lost or stolen card.
Data Definitions	Lost or stolen e-money card	Updated to link with fraud conducted with a lost or stolen e-money card.
Data Definitions	Low value	Minor editorial change.
Data Definitions	Mandate inexistence/invalidity	Removed to reflect the removal of that breakdown from the reporting scheme.
Data Definitions	Manipulation of the mandate	Removed to reflect the removal of that breakdown from the reporting scheme.
Data Definitions	Manipulation of the payer	Updated to add a reference to the EBA Guidelines.
Data Definitions	Merchant initiated transaction (MIT)	Updated to align with the EBA Guidelines.
Data Definitions	Modification of a payment order by the fraudster	Updated to add a reference to the EBA Guidelines.
Data Definitions	Monetary financial institutions (MFIs)	Updated to align with ESA 2010.
Data Definitions	Near Field Communication (NFC) payment	Minor editorial change.

Annex II	Heading	Amendment
Data Definitions	Non-MFI	Minor editorial change.
Data Definitions	Number of overnight deposits	Updated to align with Regulation (EU) No 1071/2013.
Data Definitions	Number of requests (AISP)	Removed as the breakdown has been removed from Annex III.
Data Definitions	Number of transferable overnight deposits	Updated to align with Regulation (EU) No 1071/2013.
Data Definitions	Number of transferable overnight deposits of which: number of internet/PC linked overnight transferable deposits	Minor editorial change.
Data Definitions	Over the counter (OTC) cash deposits	Minor editorial change.
Data Definitions	Over the counter (OTC) cash withdrawals	Minor editorial change.
Data Definitions	Other e-money issuer	Minor editorial change.
Data Definitions	Other PSPs and e-money issuers (previously 'other payment service providers')	Amended to align with the breakdown in Annex III and to clarify which institutions are included in this category.
Data Definitions	Other payment services	Minor editorial change.
Data Definitions	Other services not included in Directive (EU) 2015/2366	Minor editorial change.
Data Definitions	Outstanding value on e-money storages issued by electronic money issuers	Minor editorial change.
Data Definitions	Payment card scheme (PCS)	Minor editorial change.
Data Definitions	Payment initiation service	More clarity added to the reference to PSD2 in the definition.
Data Definitions	Payment scheme	Definition updated to align with the oversight framework for payment instruments.
Data Definitions	Payment system operator (PSO)	Minor editorial change.
Data Definitions	Payment to self	Minor editorial change.
Data Definitions	Payment transaction	Definition moved to Article 1.
Data Definitions	Point of sale (POS) (new)	New definition aligned with the IFR definition.
Data Definitions	Point of sale (POS) terminal	Minor editorial change.
Data Definitions	POS transactions (except e-money transactions)	References to ATM transactions removed.
Data Definitions	PSU of the reporting PSP	Definition removed.
Data Definitions	General government (previously 'Public administration')	Updated to align with the definition of general government in ESA 2010.
Data Definitions	Recurring transaction	Minor editorial change.
Data Definitions	Reporting PSP	Definition removed.
Data Definitions	Retail payment system (RPS)	New definition aligned with the SEPA Regulation.
Data Definitions	Secure corporate payment processes and protocols	Minor editorial change.
Data Definitions	Single Euro Payments Area (SEPA)	Updated for greater clarity.
Data Definitions	SEPA CT inst scheme	Definition removed.
Data Definitions	SEPA CT scheme	Definition removed.
Data Definitions	SEPA Direct Debit B2B scheme	Definition removed.
Data Definitions	SEPA Direct Debit Core scheme	Definition removed.
Data Definitions	TARGET2 component system	Definition removed.
Data Definitions	Tiering arrangement (new)	Added to support the definition of 'Indirect participant'.
Data Definitions	TIPS	Definition removed.
Data Definitions	Transaction Risk Analysis (TRA)	Minor editorial change.

Annex II	Heading	Amendment
Data Definitions	Transactions at terminals at which transactions are acquired by non-resident PSPs with cards issued by resident PSPs	Amended for greater clarity.
Data Definitions	Transactions at terminals at which transactions are acquired by non-resident PSPs with cards issued by resident PSPs	Minor editorial change.
Data Definitions	Transferable deposits	Updated to align with Regulation (EU) No 1071/2013.
Data Definitions	Trusted beneficiaries	Minor editorial change.
Data Definitions	Unattended terminals for transport fares or parking fees	Minor editorial change.
Data Definitions	Unauthorised payment transaction	Updated to align with the definition in the EBA Guidelines.
Data Definitions	Unauthorised e-money account transaction	Minor editorial change.

Annex III	Heading	Amendment
Introduction	Introductory paragraph	Updated to clarify which tables should be reported by (i) PSPs and (ii) PSOs. In addition, the paragraph no longer specifies that reporting agents granted a derogation should report only Tables 4b and 5b.
Table 1	Institutions offering payment services to non-monetary financial institutions (non-MFIs)	Term 'original units' replaced with 'number in actual units', clarification added on how the value should be reported. Minor editorial change.
Table 1	Institutions offering payment services to non-monetary financial institutions (non-MFIs)	The category 'Account information service providers – number of clients' is included as sub-category of 'Credit institutions' to clarify that credit institutions, when providing account information services, should report their number as clients.
Table 1	Institutions offering payment services to non-monetary financial institutions (non-MFIs)	The category 'Payment institutions' no longer included in the category 'Other payment service providers'; the former also removed from the reporting table.
Table 1	Institutions offering payment services to non-monetary financial institutions (non-MFIs)	The category 'Account information service providers' now included as a sub-category of 'Payment institutions'.
Table 2	Payment card functions	Minor change in terminology in table header.
Table 2	Payment card functions	In the title of Table 2, the term 'original units' replaced with 'number in actual units'.
Table 2	Payment card functions	In Table 2 headers for card functions have been updated to align with the IFR.
Table 2	Payment card functions	In Table 2 acronym 'CPS' replaced with 'PCS'.
Table 2	Payment card functions	In Table 2 the breakdown 'Cards with an e-money function that have been loaded at least once' should only apply to 'Cards on which e-money can be stored directly' and has therefore been moved.
Table 3	Payment card accepting devices	Minor change in terminology in table header.
Table 3	Payment card accepting devices	In the title of Table 3, the term 'original units' has been replaced with 'number in actual units'.
Table 4a	Payment transactions involving non-MFIs	A footnote has been added to the sub-title to clarify the reporting of the geographical breakdown for card-based payment transactions.
Table 4a	Payment transactions involving non-MFIs	In Table 4a there are a number of editorial changes to correct minor typographical errors or to better align the terms used with terms in the IFR.
Table 4a	Payment transactions involving non-MFIs	In Table 4a the breakdown 'Others' for card-based payment transactions with card-based payment instruments issued by resident PSPs has been introduced for remotely initiated transactions.
Table 4a	Payment transactions involving non-MFIs	In Table 4a the breakdowns for authentication of cash withdrawals have been removed.
Table 4a	Payment transactions involving non-MFIs	In Table 4a the 'Reasons for authentication via non-SCA' have been removed from the scheme breakdowns to reduce the reporting burden.
Table 4b	Payment transactions involving non-MFIs reported by reporting agents granted a derogation	A footnote has been added to the sub-title to clarify the reporting of the geographical breakdown for card-based payment transactions.
Table 4b	Payment transactions involving non-MFIs reported by reporting agents granted a derogation	In Table 4b there are a number of editorial changes to correct minor typographical errors or to better align the terms used with terms in the IFR.
Table 4b	Payment transactions involving non-MFIs reported by reporting agents granted a derogation	In Table 4b the breakdowns for authentication of cash withdrawals have been removed.
Table 5a	Fraudulent payment transactions involving non-MFIs	In Table 5a there are a number of editorial changes to correct minor typographical errors or to better align the terms used with terms in the IFR.
Table 5a	Fraudulent payment transactions involving non-MFIs	In Table 5a the categories 'Mandate inexistence/invalidity' and 'Manipulation of the mandate' have been replaced with a single category 'Unauthorised payment transaction'.
Table 5a	Fraudulent payment transactions involving non-MFIs	In Table 5a, the breakdown 'Others' for card-based payment transactions with card-based payment instruments issued by resident PSPs has been introduced for remotely initiated transactions.
Table 5a	Fraudulent payment transactions involving non-MFIs	In Table 5a the breakdowns for authentication of fraudulent cash withdrawals, along with related breakdowns, have been removed.
Table 5a	Fraudulent payment transactions involving non-MFIs	In Table 5a the breakdown 'Reasons for authentication via non-SCA' has been removed from the scheme breakdowns to reduce the reporting burden.

Annex III	Heading	Amendment
Table 5a	Fraudulent payment transactions involving non-MFIs	In Table 5a the geographical breakdown for the reporting of losses due to fraud per liability bearer has been reduced to a Geo1 breakdown.
Table 5b	Fraudulent payment transactions involving non-MFIs reported by reporting agents granted a derogation	In Table 5b there are a number of editorial changes to correct minor typographical errors or to better align the terms used with terms in the IFR.
Table 5b	Fraudulent payment transactions involving non-MFIs reported by reporting agents granted a derogation	In Table 5b the breakdowns for authentication of cash withdrawals have been removed.
Table 5b	Fraudulent payment transactions involving non-MFIs reported by reporting agents granted a derogation	In Table 5b the categories 'Mandate inexistence/invalidity' and 'Manipulation of the mandate' have been replaced with a single category 'Unauthorised payment transaction'.
Table 5b	Fraudulent payment transactions involving non-MFIs reported by reporting agents granted a derogation	In Table 5b the geographical breakdown for the reporting of losses due to fraud per liability bearer has been reduced to a Geo1 breakdown.
Table 6	Payment transactions per type of terminal involving non-MFIs	In Table 6 the title has been updated to clarify that although breakdowns are generally reported on a Geo 3 basis, for those that are not, the applicable geographical breakdown is indicated beside the item.
Table 6	Payment transactions per type of terminal involving non-MFIs	In Table 6 the item 'ATM transactions' has been updated to 'Other ATM transactions' to distinguish this category from the category 'ATM transactions' in Table 8.
Table 7	Participation in selected payment systems	In the introductory statement above Table 7, a clarification has been added to indicate that this table is to be reported by PSOs.
Table 7	Participation in selected payment systems	In the sub-title of Table 7, the term 'original units' has been replaced with 'number in actual units'.
Table 7	Participation in selected payment systems	In Table 7 the term 'Public administration' has been changed to 'General government' to align with ESA 2010.
Table 8	Payments processed by selected payment systems	In the introductory statement above Table 8, a clarification has been added to indicate that this table is to be reported by PSOs.
Table 8	Payments processed by selected payment systems	The sub-title in Table 8 has been updated from Geo 3 to Geo 4 except when otherwise indicated so as to minimise the reporting burden to what is absolutely necessary. Nonetheless, the Geo 4 breakdown requested for Table 8 is formulated to be equivalent to the Geo 3 breakdown in the amending Regulation in that the EEA countries in the Geo 4 breakdown are disaggregated as compared with the Geo 3 breakdown.
Table 8	Payments processed by selected payment systems	A small number of minor editorial changes.
Table 9	Quarterly reporting of payment transactions involving non-MFIs	Headers for card functions updated to align with the IFR.
Table 9	Quarterly reporting of payment transactions involving non-MFIs	The footnote is replaced with a new footnote to explain how card payments should be reported for Table 9.
Table: Geographical breakdowns	Geographical breakdowns	The table for geographical breakdowns has been updated to include columns on Geo 2 and Geo 4 breakdowns. In the particular case of Geo 4, an update has been included to formulate this breakdown to be equivalent to the Geo 3 breakdown in this amending Regulation in that the EEA countries in the Geo 4 breakdown are disaggregated as compared with the Geo 3 breakdown.