



EUROPEAN CENTRAL BANK
EUROSYSTEM

Template for comments

Public consultation on the draft ECB Regulation amending the Regulation on payments statistics

Institution/Company

Asociación Española de Banca (Spanish Banking Association)

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General comments

Template for comments

Public consultation on the draft ECB Regulation amending the Regulation on payments statistics

Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant article/chapter/paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline:	7 May 2020
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ID	Chapter	Article	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Regulation		8 All	5	Amendment	<p>We recommend amending the paragraphs as follows:</p> <p>1. Reporting to the ECB shall begin with quarterly data for [Q1 of 2022 by end-May 2022] and semi-annual data for [H1 of 2022 by end-November 2022].</p> <p>2. Reporting to the ECB for annual data shall begin with the reference period [2022 by end-May 2023].</p>	<p>The timeframe for first reporting is challenging. The first reporting should start with the calendar year, that seems more coherent for the outcome report. Otherwise historical series will have half-year in the old format and half-year in the new one, that will also impact the forthcoming years comparisons. Additionally the proposed schedule will make the implementation of the report coincident with the critical preparations for the consolidation of the TARGET system, leading to a conflict of resources. The dates for first reporting should be deferred to enable PSPs to start collecting data once the new consolidated system is operational.</p>		Don't publish
2	Annex I	Part 2.3.2		12	Amendment	Payment transactions involving...(Table 4a) should say (Table 4b)	The title of this part refers to table 4a when it should refer to 4b		Don't publish
3	Annex I	Part 2.4.2		18	Amendment	Payment transactions involving...(Table 5a) should say (Table 5b)	The title of this part refers to table 5a when it should refer to 5b		Don't publish
4	Annex II	Data definitions		1	Amendment	Definitions of Large Value and Retail payments systems are to be included	The reference to the definition of large value payment system and retail payment system are missing in the document		Don't publish
5	Annex III	Reporting Schemes		1	Clarification	A new paragraph should be added to clarify how a parent company has to report the non consolidated business of branches located in other euro area Member State or outside of the euro area.	Part 1.3 of annex I explains the consolidation principles, but nothing is said about reporting scheme for the non consolidated business, whether the reporting should be provided by the parent for each branch individually.		Don't publish

6	Annex III	Table 1		1	Amendment	Number of payments accounts accessed by AISP is requested to be reported under Geo 3, it should be amended as Geo 0 as the rest of the table	If number of deposits are to be declared under Geo 0 what is the purpose of Geo 3 for accounts accessed? For credit institutions only domestic accounts are to be included in this table but other accounts could be reported under payment accounts accessed.		Don't publish
7	Annex III	Table 4a		4-7	Amendment	Data requested in this table applies to GEO 3 (each country in the European Economic Area). It should say GEO 1 except when otherwise indicated	Considering that Table 9 is quarterly reported, and that there is already Geo 6 breakdown, table 4a should only apply to GEO1 or only aggregate data from the EU countries should be requested. GEO 3 can be understood for aggregated information -and preferably not included in table 9- (i.e. total credit transfers -received-, total direct debits -received-, card payments -received-, total cash withdrawals, total e-money payments -received-, cheques received money remittances, other payment services)		Don't publish
8	Annex III	Table 4a		5	Deletion	Deletion of the NFC detail requirements	It is not relevant and it may even lose value in the future due to the changing technology		Don't publish
9	Annex III	Table 4a		5	Amendment	Within the table the cell for "Card payments with cards issued by resident PSPs" [Sent/Total] should be highlighted in grey	For coherence purposes card payment transactions issued (sent) are to be reported		Don't publish
10	Annex III	Table 4a		5	Amendment	Within the table the cells for "Card payments with cards issued by resident PSPs initiated electronically [Sent/Total+remote+non-remote] should be highlighted in grey	For coherence purposes card payment transactions issued electronically (sent) are also to be reported		Don't publish
11	Annex III	Table 5a		11	Amendment	Data requested in this table applies to GEO 3 (each country in the European Economic Area). It should say GEO 1 except when otherwise indicated	We suggest providing a Geo 1 as default breakdown for detailed levels and Geo 3 only for total transactions level (i.e. fraudulent credit transfers total, fraudulent direct debits total, fraudulent card payments sent and received, fraudulent cash withdrawals using cards total, fraudulent e-money payment transactions with e-money total, cheques, money remittances, other payment services). See comment for id. 7		Don't publish
12	Annex III	Table 5a		13	Deletion	Deletion of the NFC detail requirements	It is not relevant and it may even lose value in the future due to the changing technology		Don't publish
13	Annex III	Table 7		23	Amendment	It should say "Table 7 is reported by payment system operators"	The requested information should be reported only by the payment systems operators and not by all the reporting agents except those granted derogation		Don't publish

14	Annex III	Table 8		24	Clarification	Clarification on the definition of large value payment system and retail payment system to be used for the reporting	The reference to the definition of large value payment system and retail payment system are missing in the document. See comment for id. 4		Don't publish
15	Annex III	Table 9		25	Amendment	The requested breakdown information on card payments at the Merchant Category Code MCC level for a table that is also reported on a Geo 6 breakdown, should be deleted.	The combination of the geographical and MCC code breakdown for the quarterly report for the electronically initiated card payments gives a level of granularity that brings too much complexity with no significant value for the statistical purpose of the payments report		Don't publish
16	Annex III	Table 9		25	Clarification	Clarification on whether the geographical breakdown should be done by acquirer's or by the merchant's country			Don't publish