**Comments from Pan Nordic Card Association for**

**Draft EBA Guidelines on the security of internet payments prior to the transposition of the revised Payment Service Directives.**

On 20 October 2014, the EBA published a [“Consultation Paper on the Implementation of draft EBA Guidelines on the Security of Internet Payments prior to the Transposition of the Revised PSD2”.](https://www.eba.europa.eu/-/eba-consults-on-implementation-of-guidelines-on-internet-payments-security) The EBA invites comments on all proposals put forward in this paper and in particular on the specific question detailed below. The consultation runs until **14 November 2014**.

The EBA invites comments on all proposals put forward in this paper and in particular on the specific question stated in the paper.

Comments are most helpful if they:

- respond to the question stated;

- indicate the specific point to which a comment relates;

- contain a clear rationale;

- provide evidence to support the views expressed/ rationale proposed; and

- describe any alternative regulatory choices the EBA should consider.

**Submission from:**

Organisation: Pan Nordic Card Association

Reference: Helle Schlegel Rasmussen, email: hsr@pan-nordic.org

**Question asked:**

*Do you prefer for the EBA guidelines a. to enter into force, as consulted, on 1 August 2015 with the substance set out in this consultation paper, which means they would apply during a transitional period until stronger requirements enter into force at a later date under PSD 2 (i.e. a two-step approach); or to anticipate these stronger PSD 2 requirements and include them in the final guidelines under PSD 1 that enter into force on 1 August 2015, the substance of which would then continue to apply under PSD 2 (i.e. a one-step approach).*

**Response and comment:**

**The members of the Pan Nordic Card Association favours option b if the content of requirements and guidelines in PSD 2 is well-known** (in the following referred to as *Option c).*

*Option a)* being a two-step approach implies risks that changes to the set-up for the stakeholders in the cards business (being issuers, acquirers, merchants and cardholders) will occur between August 2015 and the date for the definitive and final text of the PSD 2. For all stakeholders such changes cause risks of vainly implementations and considerable costs which we cannot support.

*Option b)* implies a one-step approach taking into account the anticipated stronger PSD 2 requirements. As discussions on security issues and requirements are still very hot topics and work is going on also in 2015, changes to the known requirements must be expected. We then face a two-step approach anyhow.

Therefore we should prefer a third option (*option c)* where recommendations (or even better best practices) after consultations with the market stakeholders were issued by the EBA after the entry into force of the PSD2 taking into account the requirements from the PSD2.

14 November 2014

Helle Schlegel Rasmussen

Pan Nordic Card Association