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Von: [REDACTED]
Gesendet: Dienstag, 11. November 2025 08:36
An: [REDACTED]
Cc: [REDACTED]
Betreff: PSR Gebührentransparenz
Anlagen: Proposed amendments to EU PSR on transparency of scheme fees.pdf

[REDACTED]

wir möchten Ihnen unseren detaillierten Vorschlag zur Gebührentransparenz im Rahmen der aktuellen PSR-Verhandlungen übersenden.

Unser Vorschlag zielt darauf ab, mehr Klarheit zur Transparenz direkt im Gesetzestext der PSR zu schaffen – ohne die Notwendigkeit eines Anhangs. Dieser Ansatz erfüllt das Ziel der Transparenz für Händler und unterstützt gleichzeitig die Vereinfachungsagenda der Europäischen Kommission. Den vollständigen Vorschlag finden Sie anbei sowie weitere Erläuterungen unten.

Für Rückfragen oder einen Austausch stehen wir Ihnen jederzeit gerne zur Verfügung.

Viele Grüße

[REDACTED]

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Please find attached our proposal, which consists of two options:

- A) to provide more detail in a recital of the PSR;
- B) to provide more detail in Article 31a itself.

In our view, this approach would ensure the best possible outcome, for the following reasons:

- **Objective of the law:**
 - Our proposed amendment provides **understandable and meaningful information to merchants** – including small and micro merchants who make up of 99% of Europe's merchants. **Most SMEs are not payments experts**, and it's important to achieve a positive and efficient result that can be **easily understood by all the actors of the value chain** while limiting the need to develop complex requirements through an annex of the PSR or a separate RTS.
 - The proposed **annex is overly complex and complicated** which would defeat the purpose of transparency for most European merchants.
- **Simplification objective:**
 - Our proposal **strikes the right balance between** the merchants' need for **more transparency, while not putting excessive burden on the different actors** in the payments value chain (international and domestic card schemes, processors and acquirers of all sizes).
 - Both **the annex and the RTS would go against the spirit of the simplification agenda**. It would create significant red tape for schemes (including domestic) and acquirers of all sizes to comply with.
- **Procedural:**

- The development of **an RTS would involve lengthy and possibly burdensome process** for both the European Banking Authority (EBA) and the European Commission and **delay the implementation** of the transparency rules.
- The **annex is an RTS “in disguise”** – it defeats the purpose and is not aligned with the spirit of Level I law making

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Mastercard ist unter der Registernummer R002253 im Lobbyregister für die Interessenvertretung gegenüber dem Deutschen Bundestag und der Bundesregierung eingetragen und akzeptiert den Verhaltenskodex für Interessenvertreterinnen und Interessenvertreter.

Proposed amendments to the Council's draft EU PSR rules on transparency of scheme and processing fees and rules, and merchant service charges

DRAFT of August 1, 2025

Proposal

Option A

We propose to remove from the EU PSR the requirement for RTS that specify the criteria for a transparent and consistent disclosure of scheme and processing fees and rules for card transactions.

We instead propose to include directly in the text of the EU PSR principles that ensure a transparent and consistent disclosure of (1) scheme and processing fees and rules, and (2) merchant service charges applied by acquirers to their merchants.

To this end, we propose that Recital 32a and Article 31a of the EU PSR are amended as follows (proposed additions are underlined and bold, deletions are ~~struck out~~):

“Recital 32a

*(32a) Ensuring proper transparency and notification periods in fees charged to all business parts involved in card transactions will reduce uncertainty and improve competition in the market. It is therefore necessary to introduce and reinforce enhanced transparency requirements on payment card scheme operators, payment service providers providing acquiring services and processing entities in their dealings with each other. To ensure compliance, payment card schemes, payment service providers providing acquiring services and processing entities should be required to disclose their fees in a transparent and consistent manner. **Payment card schemes, processing entities and payment service providers providing acquiring services should provide information on their respective scheme fees, processing fees and merchants service charges that include: the type of service for which the fee is applied, the category of card based payment transactions for which the fee is applicable (e.g., transactions with credit, debit or prepaid cards, consumer and/or commercial cards); the geographical scope of application of the fee; the entities or categories of entities to which the fees are applicable; the criteria for the calculation of the fee (e.g., percentage rate or fixed value); the billing frequency; the optionality of the service for which the fee is applied. Payment card schemes and processing entities shall also provide a repository of their respective scheme and processing rules that clearly indicate the geographical scope of application of these rules.** Regulation (EU) 2015/751 (IFR) and this Regulation already lays down transparency requirements between acquirers and payees. However, the enhanced requirements laid down in this Regulation would be complementary and focus on improving how information is provided by payment card schemes and processing entities towards payment service providers providing acquiring services, and ultimately to the end-users. From the payment industry perspective and in the interests of payment users, such as merchants, the transparency of card schemes' fees and rules, ~~and~~ **processing fees and merchant service charges** is essential. ~~Detailed criteria for what constitutes a transparent and consistent disclosure of fees and rules should be laid down in regulatory technical standards developed by the EBA, in close cooperation with the ECB.~~”*

“Article 31a

Transparent practices of payment card schemes and processing entities and payment service providers providing acquiring services

1. To support business payment service users better understand their card based payment transaction acceptance costs:

i) payment card schemes and processing entities shall ensure that the rules and fees imposed on payment service providers providing acquiring services are disclosed in a transparent and consistent manner allowing comparability of billing categories between schemes and processing entities with a sufficient notice before their implementation.

ii) payment service providers providing acquiring services shall transparently disclose merchant services charges applied to their business payments services users of the payment card scheme consistently with their obligations set by Chapter 3 and Articles 9 and 12 of Regulation No (EU) 2015/751.

~~1a. The EBA shall, in close cooperation with the ECB, develop Regulatory Technical Standards to specify the criteria for what constitutes a transparent and consistent disclosure of fees and rules referred to in paragraph 1 (i).~~

~~EBA shall submit those draft regulatory technical standards to the Commission by [OP please insert the date= 18 months after the date of entry into force of this Regulation].~~

~~Power is delegated to the Commission to adopt the regulatory technical standards referred to in the first subparagraph in accordance with Articles 10 to 14 of Regulation (EU) No 1093/2010.~~

2. For the purposes of paragraph 1 (i), operators of payment card schemes and operators of processing entities, shall communicate, where applicable, any change in scheme and processing rules and fees unambiguously in a transparent and consistent manner to the payment service providers providing acquiring of payment transactions no later than 6 months prior to their implementation."

Option B

If EU regulators were to hold that the criteria for transparent and consistent disclosure of fees and rules must be set out directly in Article 31a EU PSR, we propose that Recitals 32a and Article 31a EU PSR are amended as follows (proposed additions are underlined and bold, deletions are ~~struck out~~):

"Recital 32a

Ensuring proper transparency and notification periods in fees charged to all business parts involved in card transactions will reduce uncertainty and improve competition in the market. It is therefore necessary to introduce and reinforce enhanced transparency requirements on payment card scheme operators, payment service providers providing acquiring services and processing entities in their dealings with each other. To ensure compliance, payment card schemes, payment service providers providing acquiring services and processing entities should be required to disclose their fees in a transparent and consistent manner. Regulation (EU) 2015/751 (IFR) and this Regulation already lays down transparency requirements between acquirers and payees. However, the enhanced requirements laid down in this Regulation would be complementary and focus on improving how information is provided by payment card schemes and processing entities towards payment service providers providing acquiring services, and ultimately to the end-users. From the payment industry perspective and in the interests of payment users, such as merchants, the transparency of card schemes' fees and rules, and processing fees and merchant service charges is essential. ~~Detailed criteria for what constitutes a transparent and consistent disclosure of fees and rules should be laid down in regulatory technical standards developed by the EBA, in close cooperation with the ECB.~~

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~~1a. The EBA shall, in close cooperation with the ECB, develop Regulatory Technical Standards to specify the criteria for what constitutes a transparent and consistent disclosure of fees and rules referred to in paragraph 1 (i).~~

~~EBA shall submit those draft regulatory technical standards to the Commission by [OP please insert the date= 18 months after the date of entry into force of this Regulation].~~

~~Power is delegated to the Commission to adopt the regulatory technical standards referred to in the first subparagraph in accordance with Articles 10 to 14 of Regulation (EU) No 1093/2010.~~

1a. For the purposes of paragraph 1, payment card schemes, processing entities and payment service providers providing acquiring services shall provide the following information on their respective scheme fees, processing fees and merchants service charges:

(a) the type of the service for which the fee is applied;

(b) the category of card based payment transactions for which the fee is applicable, such as:

(i) transactions with credit cards, debit cards and prepaid cards;

(ii) transactions with consumer payment cards and commercial payment cards;

(c) the geographical scope of application of the fee;

(d) the entities or categories of entities to which the fees are applicable;

(e) the criteria for the calculation of the fee such as a percentage rate or a fixed value;

(f) the billing frequency of the fee;

(g) the optionality of the service for which the fee is applied.

Payment card schemes and processing entities shall also provide a repository of their respective scheme and processing rules that clearly indicate the geographical scope of application of their rules.

2. For the purposes of paragraph 1 (i), operators of payment card schemes and operators of processing entities, shall communicate, where applicable, any change in scheme and processing rules and fees unambiguously in a transparent and consistent manner to the payment service providers providing acquiring of payment transactions no later than 6 months prior to their implementation."