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**Betreff:** Ratsarbeitsgruppe am 12.06. - Payment Account-Definition  
**Datum:** Montag, 10. Juni 2024 um 17:11:57 Mitteleuropäische Sommerzeit

[REDACTED]  
[REDACTED]  
**Anlagen:** image001.png

Hallo [REDACTED]

[REDACTED]

Im Hinblick auf die Ratsarbeitsgruppe am Mittwoch wollte ich gerne kurz folgenden Punkt zur Payment Account-Definition mit Ihnen teilen:

**Open Banking:**

- The Payment Accounts definition (Recital 20 PSR): The Belgian presidency is proposing a wider PA definition which could lead to potential inconsistencies in in the EU. The amendments to Recital 20 PSR changing current wording from 'is used to ' to 'can be used' could cause a major impact as criteria to be considered a PA could vary, especially when accompanied with the more controversial addition of the faculty for NCAs to determine on a case-by-case basis whether credit card accounts meet the criteria to be considered PA (i.e., allowing for sending and receiving funds) as this could be detrimental to harmonization – especially when introduced in legal instrument with direct applicability (PSR). We would be more comfortable maintaining the current version of the definition that happens to be in line with the ECJ too as already referred in previous exchanges.

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