

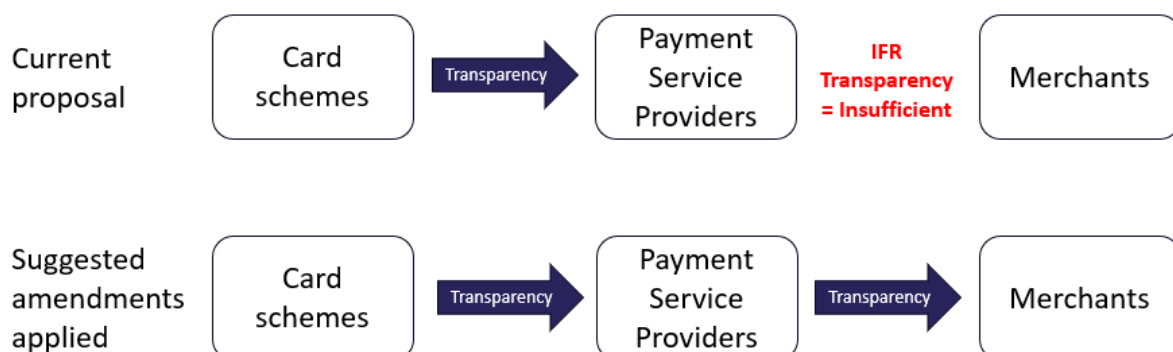
# Merchant Payments Coalition Europe

October 2025



## PSR card fee transparency: don't keep merchants in the dark

The current proposal for Article 31a of the Payment Services Regulation requires fee transparency between card schemes and Payment Service Providers (PSPs), **but does not require the same between PSPs and merchants**



### Why amendments are needed to ensure equal transparency is available to merchants

- In the absence of a direct contractual relationship with card schemes, **merchants lack the ability** to influence or negotiate rule and fee changes directly impacting them. The introduction of transparency obligations on card schemes is crucial to ensure acquirers can relay such information to merchants.
- The goal of Article 31a, as per recitals, is to **provide transparency for business end users** (merchants), in the end benefiting consumers. An important amendment is therefore needed to ensure that the consistent and simple transparency that acquirers will receive from card schemes **will be equally available to merchants and will not stop at acquirer level**.
- The current text limits acquirers' disclosure to IFR (EU 2015/751) provisions (see Art, 31a.1.ii PSR shown below), however **IFR does not mention 'transparent and consistent disclosure' of fees and rules, nor the use of a consistent and simple taxonomy of fees**.
- **Adequate review clauses** are needed to ensure flexibility and futureproof the taxonomy by allowing updates to the list of minimum information requirements when necessary.

## Merchants suggest the following amendments to Art. 31a

Based on a recently **amended** version of Council General Approach of 13 June 2025. Find our suggested amendments shown **below highlighted**.

| Merchant Payments Coalition proposed wording                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Art. 31a PSR, Council General Approach</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>1. To support business payment service users better understand their card based payment transaction acceptance costs:</p> <ul style="list-style-type: none"><li>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 <b>for the</b> comparability of billing categories between schemes and processing entities with a sufficient notice before their implementation, <b>according to the simplified taxonomy of fees mentioned in Annex [tbd]</b>.</li><li>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 <b>consistently with their obligations set by Chapter 3 and Articles 9 and 12 of Regulation No (EU) 2015/751, according to the simplified taxonomy of fees mentioned in Annex [tbd], enabling comparability of fees between payment card schemes and between products of payment card schemes, between (groups of) scheme fees and between payment service providers.</b></li></ul> |
| <p>2. For the purposes of paragraph 1</p> <p>(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 no later than 6 months prior to their implementation.</p> <p><b>(ii) payment service providers providing acquiring services shall communicate, where applicable, any change in fees unambiguously in a transparent and consistent manner to business payments services end users no later than 6 months prior to their implementation.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>New paragraph 3 added to Article 108 PSR – Review clause, Council General Approach</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>1.</b> The Commission shall, by [OP please insert date = 18 months after the date of entry into force of this Regulation] and every two years thereafter submit to the European Parliament, the Council, the ECB and the European Economic and Social Committee, a report on the practices of payment card schemes, processing entities, payment service providers providing acquiring services and in particular on:</p> <p>(a) The evolution of their fees in the EEA; including</p> <ul style="list-style-type: none"><li>1) Fees charged by payment card schemes and processing entities to payment service providers providing acquiring by key transaction category, per Member State,</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

- ii. Fees charged by payment service providers providing acquiring services to business payment service users;

(b) The conditions related to the application of new rules and associated fees, such as notification period of these rules and fees by payment card schemes and processing entities, **including in relation to the simplified minimum elements of fees mentioned in Annex [tbd];**

(c) The communication by payment card schemes to payment service providers providing acquiring services and processing entities related to rules and fees and their implementation timeline;

(d) The capacity of issuers and acquirers **and business end users** to negotiate rules and fees proposed by payment card schemes;

(e) The competitive behaviour of the payment card schemes in the acquiring and issuing markets. Where appropriate, the Commission shall submit a legislative proposal together with that report.

A nonconfidential version of the report should be made available to the public, including but not limited to aggregate information on the evolution of fees.

**2. The power to adopt delegated acts to amend or supplement the simplified taxonomy of fees mentioned in Annex [tbd] is conferred on the Commission should the assessment under paragraph 1 of this article demonstrate the need for further granularity in the information provided to business end users to fulfil the spirit of Art. 31a of this Regulation.**

See next page for proposed Annex: Simplified taxonomy of fees.

### Merchant Payments Coalition Europe

[EuroCommerce](#), [Ecommerce Europe](#), [EACT](#), [IATA](#), [Independent Retail Europe](#) and [SME United](#) have decided to start working more closely together on the topic of retail payments. Merchants across sectors share a common ambition for the future of retail payments in the EU, but also share specific concerns such as the rising payment costs. By creating this coalition, European retail associations aim to foster the exchange of information and views on ongoing legislative and regulatory developments and innovation.

Whilst each organisation within the coalition has its own responsibility and membership, together we coordinate our actions and make the merchants' voices heard more clearly. Merchants are an essential part of the payment ecosystem, with a direct connection to consumers, and are always directly and indirectly impacted by regulatory, technical and business developments on payments. We, therefore, advocate for their views and experience to be taken into account in these developments.



## Annex: Simplified taxonomy of fees

Minimum elements payment card scheme operators shall include in their invoices to PSPs providing acquiring services and that PSPs providing acquiring services shall include in their invoices to business end users.

Invoices should be provided in machine-readable and structured format that enables PSPs providing acquiring services and business end users to tie the fees back to the individual transaction, and should contain at least the following elements:

- 1) Interchange fee:
  - a) Domestic (within the same country) or Intra-EEA (within the EEA, but not within the same country) or Interregional (outside of the EEA)
  - b) Debit (including pre-paid) or Credit (including deferred debit)
  - c) Consumer or Commercial
- 2) Scheme fees:
  - a) Mandatory, excl. processing, that apply to all transactions
  - b) Processing, that apply to all transactions
  - c) Incentives, apply depending on acquirer/merchant behaviour
  - d) Non-compliance, apply depending on acquirer/merchant behaviour
  - e) Optional, acquirer/merchant choice
  - f) Other, e.g. periodical, non-transaction related, tiered volumes, etc.
- 3) Transaction information:
  - a) Unique identifier
  - b) Transaction date
  - c) Billing date
  - d) Transaction amount
  - e) Billing rate
  - f) Merchant identifier
  - g) Merchant Category Code (MCC)
  - h) Terminal identifier
  - i) Country of transaction
  - j) Payment service provider identifier

Minimum elements for payment card scheme fee operators when communicating changes to fees and/or rules to payment service providers providing acquiring services (“Pricing Decision Record”) and for payment service providers providing acquiring services to business end users.

The “Pricing Decision Record” should be provided in machine-readable and structured format and contain at least the following elements:

1. Name of the fee and/or rule
2. Identifier of the fee and/or rule
3. Previous name(s) of the fee and/or rule (if applicable)
4. Previous identifier(s) of the fee and/or rule (if applicable)
5. Category of the fee and/or rule (mandatory, optional, other)
6. Date of change proposed
7. Date of communication of change proposed
8. Date(s) of the previous change(s) (if applicable)
9. New billing rate
10. Previous billing rate(s)
11. Description of the change proposed
12. Description of the outcome of the change proposed
13. Description of the interest of the change proposed
14. Description of the commercial reasoning behind the change proposed
15. Requirements for triggering the fee (if applicable)
16. Point of contact