



Brussels, 7 November 2014
(OR. en)

Interinstitutional File:
2013/0265 (COD)

15202/14
ADD 1

EF 300
ECOFIN 1022
CONSUM 232
CODEC 2186

REPORT

From: Permanent Representatives Committee
To: Delegations

Subject: Proposal for a Regulation of the European Parliament and of the Council on interchange fees for card-based payment transactions (First Reading) - *General approach (Declarations for the minutes)*

DECLARATION BY ESTONIA

"Estonia strongly supports an open, innovative and efficient market for card payments in Europe. However Estonia finds it disproportionate to cap interchange fees, using this method as a primary regulatory measure for the card payment market. Instead of capping interchange fees, Estonia prefers a step-by-step approach starting with the application of transparency requirements for fees followed by gradually strengthening requirements. All related fees for card payments should rather be cost-based in order to ensure sustainable functioning of the card payments' business models. This would contribute to achieving a level playing field for the card payments market, enhance free competition and would provide better possibilities for new service providers to enter the market."

DECLARATION BY FINLAND

"Finland can in general support the proposal presented by the Presidency for general approach regarding the proposal for the Regulation of the European Parliament and of the Council on interchange fees for card-based payment transactions.

However, Finland would like to point out that the wording for cross-border and default domestic interchange fee caps diverge, which can be seen as being in conflict with the requirements on harmonized SEPA-wide pricing set out in Article 1 of Regulation EU 924/2009 on cross-border payments in the Community and repealing Regulation (EC) No 2560/2001 according to which it lays down rules on cross-border payments within the Community, ensuring that charges for cross-border payments within the Community are the same as those for payments in the same currency within a Member State. Finland proposes that this inconsistency in the proposed Council's General Approach with Regulation 924/2009 would be remedied during the trilogy negotiations.

In addition, we consider that the clarity and drafting of the compromise text in Articles 3, 10 and 15 could be improved as well as in recital 19a."
