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European Banking Authority
One Canada Square (Floor 46)
Canary Wharf
London E14 5AA

9 August 2018

Dear Sir / Madam,

Draft Guidelines on the conditions to be met to benefit from an exemption from contingency measures under Article 33(6) of Regulation (EU) 2018/389 (RTS on SCA & CSC)

The Financial Services Consumer Panel welcomes the opportunity to respond to the EBA's consultation on Draft Guidelines on the conditions to be met to benefit from an exemption from contingency measures under Article 33(6) of Regulation (EU) 2018/389 (RTS on SCA & CSC)

We are responding only to question 4 of the consultation:

Do you agree with the EBA's assessments on obstacles, the options it considered and progressed or discarded, and the requirements proposed in Guideline 5? If not, please provide your reasoning.

Yes, we agree with the EBA's assessments on obstacles. The Panel believes that there are considerable security advantages to consumers from redirection i.e. where a consumer using an AISP/PISP is redirected to their ASPSP's website to enter their credentials directly. This enables them to share access to their account for the use of AISP/PISP services without having to share their login credentials with the AISP/PISP.

We are aware that there has been pressure on the EBA from some AISPs, PISPs and industry groups to declare all redirection an obstacle. We believe that this would be wholly counter to the spirit of PSD2, which is about offering consumers choice of services while improving security and standards of authentication. Consumer choice and empowerment are welcome, but this should not be at the expense of security. We strongly urge the EBA to retain Guideline 5 as it stands.

Yours faithfully

Sue Lewis
Chair, Financial Services Consumer Panel