

**Question ID**

2024\_7261

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**Legal act**

Directive 2015/2366/EU (PSD2)

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**Topic**

Other topics

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**Article**

66

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**Paragraph**

4

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**Subparagraph**

b

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**COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations**

Regulation (EU) 2018/389 - RTS on strong customer authentication and secure communication

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**Article/Paragraph**

35.4.b

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**Type of submitter**

Other

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**Subject matter**

Obstacles Faced by PISPs in Accessing Payment Status Information Under PSD2

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**Question**

Are ASPSPs allowed to require PISPs to provide any additional identifier beyond what is specified in Article 35.4.b of the RTS in order to access information about the execution of a payment order?

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**Background on the question**

In accordance with Articles 66.4.b of the PSD2, Account Servicing Payment Service Providers (ASPSPs) are required to provide or make available all necessary information on the initiation and

execution of payment transactions to Payment Initiation Service Providers (PISPs) upon receipt of a payment order. Specifically, Article 66.4.b mandates that this information be shared with the PISP immediately following the payment initiation, while RTS Article 35.4.b stipulates that all parties involved must include unequivocal references to identify each payment order

Additionally, Article 36.1.b of the RTS requires that PISPs have access to all relevant information about the initiation and execution of payment orders.

However, some ASPSPs, unlike the broader industry standard, impose additional requirements, such as mandating the use of a "user token" to access payment execution information.

This practice conflicts with broader industry standards, where ASPSPs provide the necessary information without imposing similar constraints. Requiring "user tokens" undermines the uniformity intended by PSD2, leads to inconsistency among ASPSPs, and hinders PISPs' ability to comply with their obligations under PSD2 and the RTS.

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28/11/2024

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29/08/2025

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**Final answer**

Under Article 66(4)(b) of Directive (EU) 2015/2366 (PSD2), Account Servicing Payment Service Providers (ASPSPs) are required to provide Payment Initiation Service Providers (PISPs), "immediately after receipt of the payment order" from the PISP, with all information on the initiation of the payment transaction and all information accessible to the ASPSP regarding the execution of the payment transaction.

This requirement is also set out in Article 36(1)(b) of Commission Delegated Regulation (EU) 2018/389 (the Delegated Regulation), which specifies that ASPSPs "shall, immediately after receipt of the payment order, provide [PISPs] with the same information on the initiation and execution of the payment transaction provided or made available to the payment service user when the transaction is initiated directly by the latter".

As clarified in [Q&A 4601](#), it follows from the above legal provisions that PISPs are entitled under Article 66(4)(b) PSD2 to the information on the execution status that is accessible to the ASPSP immediately after receipt of the payment order. PSD2 does not require ASPSPs to provide updates at a later stage. While ASPSPs may voluntarily provide such additional updates, they are not legally obliged to do so.

Article 35(4)(b) of the Delegated Regulation, cited by the submitter, requires that PISPs include a unique reference to the payment transaction initiated. This provision relates to the secure identification and traceability of the transaction during the communication between ASPSPs and

PISPs, and does not govern the conditions under which execution status information may be accessed after the transaction has been initiated.

Accordingly, if an ASPSP chooses to provide additional execution status information to PISPs beyond what is required under PSD2, it may define the technical and security conditions for such access. This may include asking for an user token, provided such mechanisms do not obstruct access to the information that ASPSPs are legally required to provide under PSD2.

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## **Status**

Final Q&A

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## **Answer prepared by**

Answer prepared by the EBA.

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