Question ID

2025_7644

Legal act

Directive 2015/2366/EU (PSD2)

Topic

Other topics

Article

64

Paragraph

2

Subparagraph

n.a.

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

Not applicable

Article/Paragraph

n.a.

Type of submitter

Other

Subject matter

Obligations of ASPSPs to inform PISPs about the execution status of individual payments executed under a standing order initiated via API.

Question

Under PSD2, when a PISP initiates a standing order on behalf of a PSU, the ASPSP generally communicates only the result of the standing order setup (i.e. whether the standing order has been accepted or rejected).

In practice, PISPs typically do not receive information on the execution status of each individual payment transaction carried out under that standing order, even though each execution constitutes a separate payment transaction under PSD2. This creates uncertainty as to whether ASPSPs are required to make this information available to PISPs in the same way it is made available to PSUs in online banking channels.

Should ASPSPs provide PISPs with information on the execution status (e.g. executed or rejected) of each individual payment transaction executed under a standing order initiated by a PISP?

Background on the question

Article 64(2) PSD2 states that a standing order constitutes the PSU's consent for a series of individual payment transactions. Each execution of a scheduled payment therefore qualifies as a separate "payment transaction" under PSD2.

When an ASPSP offers standing order initiation as a service, it may be available both through the ASPSP's online banking channel and via dedicated PSD2 interfaces. In the case of the PSD2 channel, the PISP transmits the PSU's instruction to the ASPSP, which then establishes the standing order within its system. After the standing order is set up, the PISP typically does not receive information about the execution status of individual payment transactions.

This situation raises uncertainty as to whether the obligation to provide information to PISPs applies solely to the standing order setup or also to each subsequent individual payment executed under the standing order.

The setup of the standing order itself constitutes consent for multiple future payments, rather than a payment transaction. Each future debit executed automatically by the ASPSP constitutes a distinct payment transaction under Articles 4(5) and 64 PSD2. In parallel, PSUs are able to view the execution status of these individual payments in online banking channels.

Clarity from the EBA is needed to ensure a harmonized interpretation of PSD2, so that PISPs receive information equivalent to that provided to PSUs, and to clarify whether the execution status of each individual payment under a standing order must be communicated to the PISP.

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12/06/2026

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 and Q&A 7261, it follows from the above legal provisions that PISPs are entitled under Article 66(4)(b) PSD2 to 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. This approach also applies to cases where a PISP places a standing order on behalf of a PSU. In such case, the ASPSP is not legally required to provide to the PISP information about the execution status of each individual payment transaction covered by the respective standing order where that information is not known to the ASPSP immediately after receipt of the payment (standing) order.

Status

Final Q&A

Answer prepared by

Answer prepared by the EBA.