

T2/TARGET Instant Payment Settlement (TIPS)

Non-banks payment service providers access to T2 and TIPS



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Background



- Long-lasting discussions on the opportunity of accepting non-bank
 PSPs in TARGET Services
- Interest expressed by non-bank PSPs following the entry into force of the PSD
- Legal hurdles to accept non-bank PSPs in TARGET2/T2 owing to specific provisions of the SFD



IPR amending the SFD in April 2024, making it **legally feasible** to consider the direct participation of non-bank PSPs to TARGET

Policy considerations



- Enhances the efficiency of the European retail payments market fostering innovation and competition
- Participation criteria shall be "objective, risk-based and publicly disclosed"
- Risk-mitigating measures to preserve market integrity and financial stability
- Harmonised approach to ensure consistency and avoid discrimination
- Applicable to TARGET Services as well as to other payment systems operated by CBs



Policy on access by non-bank payment service providers to central bank-operated payment systems and to central bank accounts (July 2024)

Access criteria



- Access granted to authorised payment institutions and electronic money institutions established in the EEA
- Rely on arrangements in place in Member States to ensure the compliance of the operational and risk management processes of non-bank PSPs
- Need to demonstrate compliance with operational and technical requirements applicable to existing participants



ECB decision on access by non-bank payment service providers to Eurosystem central bank operated payment systems and central bank accounts (ECB/2025/2)

Operational practicalities



- No access to credit
- Standard remuneration rules apply i.e. min (0, €STR-20bp)
- No safeguarding of users' funds
- Funds held on the TARGET accounts shall be limited to what is necessary to meet settlement obligations
- Definition of a maximum holding limit, which is individually set as twice the peak value of the outgoing cash transfer orders over the last 12 months
- Penalties if the limit is breached

Legal implementation



Amendments to the TARGET Guideline

Art 4 Access criteria [amended]
Art 5 Application procedure [amended]
Art 13a Maximum holding [new]

- Initially planned to enter into force on 16 June 2025
- The Eurosystem postponed until October 2025 the adoption of the amendments to the TARGET Guideline due to delays in some euro-area Member States in transposing the required amendments to the SFD and PSD2 into national legislation

Application process



- Provision of a **statement** issued by the relevant national competent authority or duly signed by the non-bank PSP's competent management body (to be renewed every year)
- Information necessary to set the maximum holding amount

Specific to non-bank PSPs

- Installation of a secured IT infrastructure to connect to TARGET
- Provision of self-attestation with TARGET security requirements
- Provision of reference data forms
- Provision of legal opinions
- Completion of certification tests

Applicable to all participants

Way forward



- Non-bank PSPs have already started to approach NCBs with a higher concentration in specific banking communities
- Tests and preparation for connection already started for some of them
- So far, the focus was more on the opening of RTGS accounts, there
 were less requests for TIPS accounts
- Specific monitoring will be put in place to follow the evolution of the business brought by non-bank PSPs in TARGET Services



It is estimated that non-banks will eventually not have a major impact on participation structure nor on system's traffic