



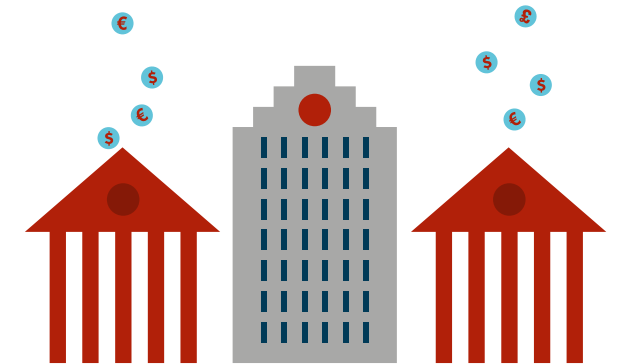
The next couple of years will see a range of legislative and regulatory developments affecting those in the payment services industry.

The table below sets out a timeline of some of the key dates and deadlines. We have included key dates from January 2016 year for context.



As well as initiatives by UK bodies like the FCA and PSR, we cover the applicable European measures and their UK implementation:

and other AML related developments.



Date	What?	Development	Commentary
<b>2016</b>			
12-Jan	PSD2	Entry into force of PSD2.	
22-Jan	AML	Deadline for responses to Joint Committee of the ESAs' October 2015 consultation papers on AML and counter terrorist financing.	
01-Feb	PSR	Payments Strategy Forum: PSR's website <a href="http://www.paymentsforum.uk">www.paymentsforum.uk</a> will go live.	Source for minutes, reports, etc. of the PSR's four Working Groups explaining the future strategy for payment systems in the UK.
01-Feb	SEPA	Date from which the FCA will operate a dedicated SEPA compliance reports email address for reporting non-compliance.	This reports mailbox will be open to everyone including consumers, firms and representative bodies.
		PSUs will no longer need to indicate the BIC for credit transfers and direct debits.	The IBAN will be sufficient on its own.
		PSPs are no longer able to provide PSUs that are consumers with BBAN to IBAN conversion services for national payment transactions.	The PSU must indicate the IBAN on all submitted SEPA credit transfers and direct debits.
		Corporate PSUs which initiate or receive credit transfers and direct debits which are bundled together must use the SEPA ISO 20022 XML standard messaging format.	
02-Feb	SEPA	Exemptions regarding use of the IBAN, BIC and ISO 20022 XML format will no longer apply.	
08-Feb	PSD2	Deadline for submission of responses in relation to the EBA's discussion paper on strong customer authentication.	
12-Feb	FCA	Deadline for comments in relation to FCA guidance consultation (published in November 2015) on firms outsourcing to the cloud and other third-party IT services.	Guidance is intended to help firms oversee outsourcing arrangements, select an outsourced provider and monitor outsourced activities.
23-Feb	PSR	Interim report published in the PSR's market review into the ownership and competitiveness of infrastructure provision.	Final report expected in Summer 2016.



Date	What?	Development	Commentary
03-Mar	PAR	FCA CP 16/7: The Payment Accounts Regulations 2015 (PAR) - Draft Handbook changes and draft guidance.	Comments were requested by 3 May 2016.
08-Mar	IFR	Deadline for submission of responses to the EBA's consultation on its draft technical standards.	
10-Mar	PSR	Interim report published on the PSR's market review into the supply of indirect access to payment systems.	Final report was expected in July 2016.
11-Mar	PSD2	Deadline to submit comments on consultation on EBA's draft consultation for RTS on passporting.	The final RTS were due to be published in summer 2016 but were finally published on 14 December.
15-Mar	PAR	PSR CP 16/1: draft guidance setting out approach to role under Payment Accounts Regulations 2015.	Comments were requested by 12 April.
18-Mar	EC's Green Paper on retail financial services	Deadline by which all interested parties are to respond to the EC's consultation.	
24-Mar	IFR	PSR policy statement on application of Interchange Fee Regulation in UK and final guidance on approach as competent authority (phase 1).	
17-May	PAR	PSR policy statement (16/2) and final guidance on alternative switching schemes under the PARs.	
19-May	IFR	PSR: Consultation paper: The application of the Interchange Fee Regulation in the UK: Phase 2 (CP16/3).	
09-Jun	IFR	Remaining business rules (Articles 7, 8, 9, 10, 11 and 12) come into effect.	
01-Jul	Electronic ID and Trust Services Regulations	Entry into force (subject to some exceptions).	

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05-Jul	AML	European Commission publish proposal to amend MLD4 (MLD5).	
07-Jul	FCA	FCA guidance on the requirements for outsourcing to the 'cloud' and third party IT servers published.	
12-Jul	PSD2	FCA: PSD2 Stakeholder Liaison Group meeting.	The FCA decided to reconvene the group (which last met in July 2013) to help with development of its approach to UK implementation of PSD2.
21-Jul	PSR	Final report on the PSR's market review into the supply of indirect access to payment systems published.	
26-Jul	FCA	Final report on the credit card market study published.	Further information on proposed rules and voluntary rules was anticipated later in the year.
09-Aug	CMA	CMA's final report on retail banking published.	
01-Aug	PAR	FCA PS16/20: The Payment Accounts Regulations 2015 - Feedback on CP16/7, final Handbook changes and finalised guidance.	
11-Aug	AML	EBA publish opinion in favour of the European Commission's proposal to make virtual currency exchange platforms and custodian wallet providers subject to MLD4.	Amendments to MLD4 were anticipated to be finalised in the second half of 2016.
12-Aug	PSD2	EBA consultation paper on RTS on strong customer authentication and secure communication published.	The deadline for comments was 12 October 2016.
13-Sep	PSD2	FCA: PSD2 Stakeholder Liaison Group meeting.	
15-Sep	AML	HM Treasury publishes consultation on transposition of MLD4.	The deadline for comments was 10 November 2016.

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18-Sep	PAD	UK PAR comes into force (except for regulations 6-12).	Regulations 6-12 (dealing with the provision of fee information, glossary and a fee comparison website) will come into force 6 months after FCA publishes its linked services list in accordance with Regulation 3.
19-Sep	PAD	HM Treasury policy paper on UK implementation of PAD.	
22-Sep	PAD	EBA published a consultation paper on draft ITS and RTS on standardised terminology and disclosure documents.	Pursuant to Article 3(4) (RTS) and Articles 4(6) and 5(4) (ITS).  The deadline to submit comments was 22 December 2016.  A public hearing was held on 21 November 2016 at the EBA premises.
22-Sep	PSD2	EBA open consultation on draft guidelines on minimum professional indemnity insurance for payment initiation and account information service providers.	
06-Oct	IFR	PSR: Policy statement: The application of the Interchange Fee Regulation in the UK: Phase 2 (PSR PS16/3).  PSR: Guidance on the PSR's approach as a competent authority for the IFR.	
12-Oct	PSD2	Deadline for comments on the EBA's consultation on strong customer authentication and secure communication RTS.	The final RTS will be published after this consultation period has ended.
14-Oct	PSD2	FCA: PSD2 Stakeholder Liaison Group meeting.	
31-Oct	SEPA	Deadline for compliance with the SEPA Regulation by PSPs located in non-euro zone Member States (e.g. the UK).	
31-Oct	PSR Payments Strategy Forum	Roundtable event to discuss Working Groups' progress on the future payment systems strategy in the UK.	
03-Nov	AML	BEIS issued a discussion paper on implementing the MLD4 provisions on increasing corporate transparency.	Deadline for comments was 16 December 2016.

Date	What?	Development	Commentary
10-Nov	AML	Deadline for comments on HM Treasury's consultation on the transposition of MLD4.	
15-Nov	PSD2	FCA: Feedback Statement: Call for Input: the FCA's approach to the current payment services regime (FS16/12).	
18-Nov	PSR Payments Strategy Forum	Roundtable event to discuss Working Groups' progress on deriving the future payment systems strategy in the UK.	
01-Dec	PSD2	FCA: PSD2 Stakeholder Liaison Group meeting	Key focus was timing of FCA consultations
26-Dec	AML	Joint Committee of the ESAs to submit draft RTS on group-wide policies and to issue an opinion on ML and terrorist financing risks affecting the EU's financial sector.	Pursuant to Article 45(6) (RTS) and Article 6(5) (opinion).  This is still awaited and timing is uncertain.
<b>2017</b>			
-	AML	Parliament and Council to negotiate, reach political agreement on, and adopt MLD5.	This may impact timings specified below for MLD4.
13-Jan	PSD2	Deadline for EBA draft RTS on: authentication and communication; and determining whether a central point of contact is appropriate.	Pursuant to Article 98(1) and Article 29(5), respectively.
		Deadline for guidelines on the minimum amount of professional indemnity insurance.	Pursuant to Article 5(4).
01-Feb	SEPA	Multilateral interchange fees per national direct debit transaction will no longer apply.	
		EC to issue a report on the application of SEPA, if appropriate with proposal.	
2-Feb	PSD2	HM Treasury's consultation on draft regulations implementing PSD2.	FCA have confirmed that their first consultation will follow HM Treasury's publication.  The second consultation is expected once final regulations are published.

Date	What?	Development	Commentary
26-Jun	AML	Deadline for MLD4 transposition and implementation.	Full text published in the Official Journal of 5 June 2015.  MLD5 sought to bring forward the transposition date to 1 January 2017 but the text is still being agreed.
	AML	Joint Committee of the ESAs to submit to the Commission draft RTS on a central contact point for electronic money issuers.	
		Joint Committee of the ESAs to issue guidelines (various AML topics).	
26-Jun	WTR	New regime applies from this date.	
		Member States to notify the Commission and the Joint Committee of the ESAs of the rules laid down on administrative sanctions and measures applicable to breaches of the revised WTR.	
		Joint Committee of the ESAs to issue guidelines on measures to be taken in accordance with the revised WTR.	
June	AML	EU Commission to produce the first EU-level supranational risk assessment report, together with recommendations to member states on measures to address the identified risks.	
		EU Commission to report to the Council on progress made in implementing the terrorist financing action plan.	
Q1	AML	HM Treasury expected to hold four-week consultation on draft of the proposed Money Laundering and Transfer of Funds (Information on the Payer) Regulations 2017.	
		FCA's consultation paper on amending its financial crime guide to take account of the new regulations implementing MLD4 is expected to be published in the first half of 2017.	

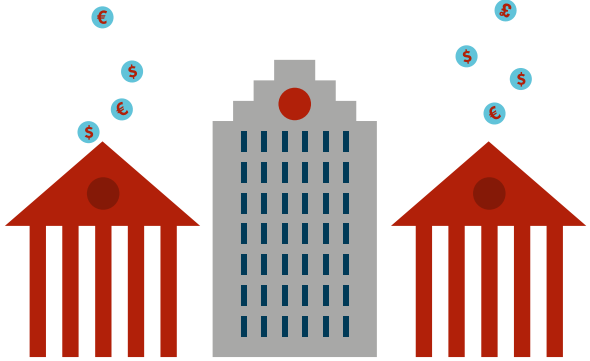


Date	What?	Development	Commentary
13-Jul	PSD2	Start date for applications by AIS and PIS PSP for authorisations or registrations.	FCA has confirmed that they will accept applications for authorisation 6 months before PSD2 comes into force.
		Deadline for EBA guidelines concerning the information to be provided in the application for the authorisation of payment institutions.	Pursuant to Article 5(5).
		Deadline for EBA draft ITS on the information to be provided by competent authorities to the EBA for compiling EBA register.	Pursuant to Article 15(5).
		Deadline for guidelines concerning the establishment, implementation and monitoring of the security measures, including certification processes.	Pursuant to Article 95(3). These guidelines are convertible into an RTS if requested by Commission.
-	PAD	RTS and ITS expected to enter into force.	
-	PAR	Within three months of the RTS entering into force, the FCA must publish the final list of most representative services.	
31-Dec	AML	Joint Committee of the ESAs expected to submit final draft RTS to Commission.	Pursuant to Article 45(6).
		EU Commission to report to the Council on progress made in implementing the terrorist financing action plan.	
<b>2018</b>			
-	PAR	Payment service providers will have to use the terms on the final list of most representative services six months after the FCA publishes the final list.	
		Within nine months of the ITS entering into force, the UK must apply the measures necessary to comply with requirements on the statement of fees, fee information document and common symbol. This means that payment service providers will have to provide consumers with a pre-contractual fee information document and an annual statement of fees.	

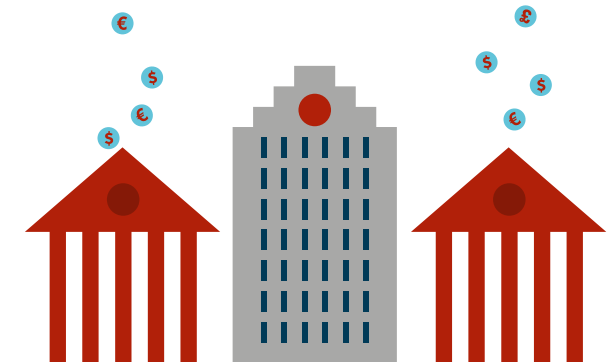


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12-Jan	PSD2	Deadline for PSD2 transposition and implementation.	
		Deadline for draft RTS on cross-border cooperation and passporting.	Pursuant to Article 28(5).
		Deadline for draft RTS on operation of central EBA register.	Pursuant to Article 15(4).
		Deadline for EBA guidelines on complaints procedure.	Pursuant to Article 100(6).
		Deadline for EBA guidelines on improving incident reporting.	Pursuant to Article 96(3).
		Deadline for draft RTS on co-operation between the competent authorities.	Pursuant to Article 29(6).
13-Jan	PSD2	The legislation becomes applicable.	
25-May	General Data Protection Regulation	The regulation becomes applicable.	
13-Jul	PSD2	Deadline for transposition and implementation of EBA's guidelines and RTS.	Pursuant to Article 109(1).
18-Sep	PAR	Member States to provide Commission with information on compliance, switching and basic bank accounts (and every two years thereafter).	Information to be provided every two years thereafter.
09-Dec	IFR	Exemption for domestic transactions under any 'three party scheme' ends.	

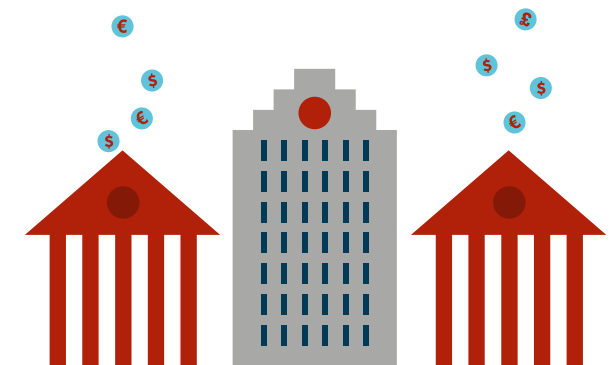
Date	What?	Development	Commentary
2019			
26-Jun	AML	EU Commission to submit a report to the Parliament and the Council assessing the conditions, specifications and procedures for the interconnection of central registers for beneficial ownership information of trusts.	
		EU Commission to submit a report to the Parliament and the Council on the implementation of MLD4.	
18-Sep	PAD	Deadline for the Commission to review the PAD and submit a report to the European Parliament and Council of the EU.	



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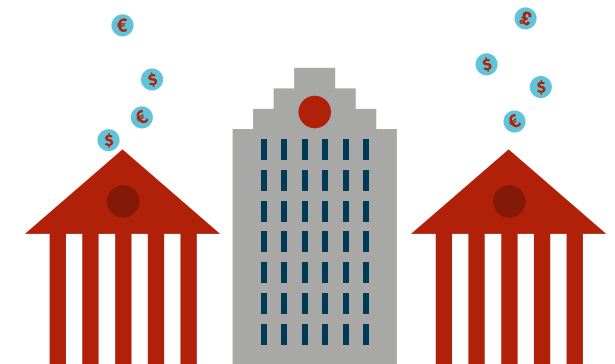
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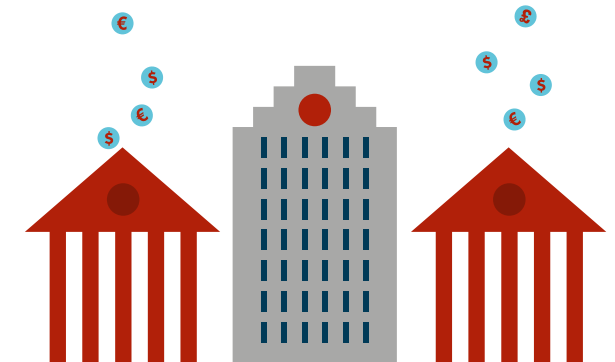
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