

Mr Paolo Gentiloni  
Commissioner responsible for  
taxation and customs

Brussels, 7 April 2020

RE: Deadline of public consultations on VAT-relevant payment data

Dear Mr Gentiloni,

First of all, please allow us to emphasise that the undersigned representatives of payment industry actors welcome all the extraordinary measures already initiated by the various European authorities following the rapid spread of COVID-19 (coronavirus) in the European Union. Prompt and dedicated reactions are very helpful, and they facilitate the necessary steps that banks and other payment service providers need to take in order to face the emergency efficiently, to the best of their ability, without hampering their indispensable payment facilitation and financing role to the economy. Just as for your authority, the coronavirus has been the number one priority for European payment service providers these days.

Against this background and in light of the challenging and uncertain circumstances, we would like to draw your attention towards the deadline of an important ongoing public consultation on Exchange of VAT-relevant payment data – survey for payment industry actors<sup>1</sup> that relates to the Council Directive (EU) amending Directive 2006/112/EC as regards introducing certain requirements for payment service providers and the Council Regulation amending Regulation (EU) No 904/2010 as regards measures to strengthen administrative cooperation in order to combat VAT fraud, both adopted on 18 February 2020.

Our members are currently focusing most of their resources on assuring a normal and smooth continuation of their activities, in order not to interrupt serving companies, in particular SMEs, and households. Similarly, associations at national and European levels are also trying to support their institutions in this endeavour. As a consequence, it takes longer to analyse consultation papers and provide detailed feedback. In our view, many institutions will not be able to give feedback on this consultation due to the short timeline given – one month for a detailed and rather technical consultation that requires the coordination of feedback from many different parts of an institution: IT, reporting, payments experts etc - coupled with the COVID-19 crisis that requires most of our attention.

We would therefore request you to consider granting an appropriate extension for this consultation and the associated call for candidates for the Commission's expert group. This would help make sure that the feedback collected from individual institutions as well as from associations meets your expectations in terms of quality and representativeness and can therefore be helpful in the future work on this file. We note that the Commission as well as for instance the European Banking Authority are already granting longer response times for different consultations due to the current exceptional circumstances.

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<sup>1</sup> <https://ec.europa.eu/eusurvey/runner/VATPaymentDataSurvey>

We hope that you share our point of view and see yourself in the position to grant and communicate a two-month extension of this consultation periods, at your earliest convenience.

We thank you very much in advance for your attention and understanding, and we remain at your disposal.

Sincerely yours,



European Association of Co-operative Banks



European Banking Federation



European Savings and Retail Banking Group



European Payment Institutions Federation



European Payments Council



mastercard