

Guiding Principles for Payments in Agentic Experiences

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Executive Summary

Agentic commerce has the potential to fundamentally transform the European economy. Early deployments are already demonstrating results: 89% of retailers integrating AI into commerce report positive revenue impact, with adoption accelerating at up to four times the pace of traditional e-commerce ([PwC Strategy&, March 2026](#)). As consumers are increasingly assisted by AI agents for routine purchasing decisions, the payments ecosystem must be ready to support this shift securely and at scale.

To fully realize these benefits within the European digital payments landscape, the industry needs to innovate in a manner that aligns with the existing regulatory frameworks. This is possible and practical in a way that protects consumers and ensures clear liability structures.

We recognise that the technology and its use cases are continuing to evolve. EPIF will continue to actively engage on these issues.

Recognising the evolution of the technology, this paper proposes an adaptable and payment method agnostic policy approach to agentic payments. By leveraging open-standards and preserving current liability frameworks, the industry can deliver uncompromising consumer protection without disrupting the foundational roles of merchants, Payment Service Providers (PSPs) and technology enablers. In particular, we encourage the adoption of existing and emerging open commerce standards, which provide strong blueprints for how sellers can make their checkouts agent-ready across AI platforms. Standards that are openly governed reduce the risk of ecosystem fragmentation.

Objective

The objective of this paper is to contribute to the ongoing policy dialogue by offering a practical, technology-based perspective on the evolution of agentic payments. By illustrating how the industry can innovate safely within the existing payments regulatory framework, this paper seeks to minimize market disruption and support regulatory continuity. This framework outlines how agentic payments operate securely today, and how cryptographic standards can satisfy complex regulatory requirements in the near future.

Background & Core Principles

As agentic commerce capabilities expand, the intersection of AI and payments must be guided by a fundamental principle: facilitating innovation without compromising consumer protection.

The introduction of agentic experiences into the shopping journey must not diminish the strong consumer protections that exist today. With the right technical framework in place, the current regulatory foundation provides a strong basis for accommodating these emerging experiences while preserving existing consumer protection principles.

Receiving help and assistance for handling commerce is not new. Consumers already seek assistance from travel agencies, corporate travel managers, and family members, as well as using automated systems like standing orders, direct debit mandates, and scheduled auto-replenishment in some cases, benefiting from the existing regulatory treatment of low-risk or merchant-initiated payment flows under PSD2. AI agents are a technological evolution of these existing models.

For interactive experiences where the human remains in the loop, existing consumer protection safeguards should be preserved to maintain the traditional checkout model. As long as users retain absolute control to review the final terms, including terms and disclosures made available by the merchant, and explicitly authorize the payment, the risk profile and regulatory reality remain identical to traditional e-commerce. This includes cases where an AI agent assists with product discovery, comparison, or cart-building, but the consumer retains full visibility of the transaction terms and explicitly authorises the payment themselves.

Existing consumer protection frameworks provide a strong foundation. Automated tools' and intermediaries' assistance in completing transactions is nascent and adequate protections should also be ensured. Rather than prescribing new regulatory solutions at this stage, industry participants should continue to facilitate existing dispute resolution mechanisms for consumers regardless of the channel through which a transaction was initiated.

A distinction should be made depending on the clarity and scope of consumer authorisation, and the degree of independent discretion exercised in the process (e.g. regarding merchant selection, product selection, or transaction amount) rather than the technology or interface used. Transactions where the consumer specifies all parameters and the intermediary merely executes them map closely to existing regulatory categories. Similarly, where the consumer has provided clear parameters within which the agent can exercise discretion, proportionate governance is appropriate regardless of how the interface presents itself to the consumer. This ensures attention is directed at actual consumer authorisation rather than surface-level categorisation.

In more autonomous experiences, proof of consumer authorization (and the scope of such authorization) will play an important role in payment flows. One possible approach to this is creating tamper-proof cryptographically signed payment mandates. As delegation scopes expand toward greater agent autonomy, payment frameworks should support the ability to capture, store, and reproduce evidence of the consumer's authorisation, including the defined parameters of that authorisation (e.g., spending limits, approved merchants, permitted categories). The form this takes should remain technology-neutral; what matters is that the consumer's intent can be reliably verified.

Because transactions in both interactive and autonomous models remain based on verifiable user consent with a well-defined expiry, existing payments liability rules and consumer protection mechanisms can continue to apply without requiring major changes to the current regulatory framework. If a transaction is completed successfully within the authorized bounds similar to MITs and direct debits, the consumer remains fully protected by existing mechanisms. They simply utilize customary dispute and refund mechanisms native to their chosen payment method (such as card chargebacks or A2A refund rights).

For both Human-in-the-Loop (HITL) and autonomous models, it is necessary to maintain the same standard of transaction transparency that exists in conventional, non-agentic payment flows today, including a verifiable record of who authorised a transaction, the scope of that authorisation, when execution occurred, and through which payment method. Agentic commerce should adopt a similar approach to verify interaction details and parties involved. This ensures operational continuity and trust while strictly upholding the principles of payments regulation. Strict privacy principles would be implemented for all user data exchanged between the user, agent and supplier/merchant.

The different stages of Agentic Commerce

Given the rapid evolution of agentic commerce, we recommend an innovation-first approach to evaluate various operational models. The stages described below are illustrative. They are designed to support risk calibration and industry dialogue rather than to define fixed regulatory categories. As the technology evolves, the boundaries between stages may shift, and new models may emerge that do not fit neatly within this taxonomy. This approach allows the industry to deliver immediate value through Human-in-the-Loop enhancements, while laying the technical groundwork for autonomous experiences. As agentic commerce matures, recognising that agents act with derivative authority (on behalf of the user, within user-defined bounds) could help the ecosystem develop appropriate trust and protection frameworks over time.

Stage 1: Human in the Loop - Interactive Checkout

This stage represents an incremental evolution of today's e-commerce experience. The AI agent acts as an advanced, user-side shopper, helping the consumer discover products and services. All transaction details (e.g. price, item, merchant, terms & conditions) are fully visible and transparently presented to the user prior to a purchase commitment. While the AI agent and the merchant's systems may authenticate to ensure secure data exchange, the user always explicitly authorizes the checkout, performing Strong Customer Authentication (SCA) in an identical manner to a traditional e-commerce transaction, including the application of applicable exemptions (e.g. TRA). The user remains fully in control, ensuring the legal and financial relationship remains strictly between the consumer and the merchant.

During this first stage, a record of events would capture transaction specifics (including price, items, merchant details, and applicable terms) alongside verifiable proof of user authorization. This approach aligns closely with conventional, non-agentic payment systems, which routinely maintain logs of the initiating party and authorization to resolve downstream disputes or customer complaints

Stage 2: Human-in-the-Loop - Guided Sourcing and Aggregation

In Stage 2, the user's requirements are more extensive (e.g., planning a multi-leg trip with specific budget constraints). The agent assists the user in formulating their precise requirements, which may be refined through the course of the interaction. Crucially, the user retains full commercial authority: the AI acts only as a technical facilitator, the user still confirms the final purchasing criteria before the agent proceeds. The agent then performs the research and formulates a proposal. This proposal can be based on real-time offers and verifiable quotes retrieved directly from merchants which clearly outline how the user's requirements have been met. The user then reviews the finalized proposal and performs the final authentication to complete the purchase. Despite the advanced assistance during the sourcing phase, the final purchase remains a direct, user-authorized checkout, in a way that is identical to Stage 1.

The record of events would potentially include information such as user requirements and merchant acceptance of the user requirements in addition to what is included in Stage 1. The exact data points could be further defined in contractual arrangements or industry standard-setting efforts or more detailed industry standard-setting efforts to account for evolving user requirements.

Stage 3: Autonomous Procurement

Representing the longer-term horizon of agentic commerce, Stage 3 extends commerce experiences by allowing the agent to complete the purchase autonomously without requiring real-time approval from the user. In this scenario, the user establishes the scope of assistance it seeks from the agent, covering permitted merchants or categories, spending limits, product requirements, and time horizons through robust authentication. This scope acts as an upfront authorisation (for example, directing an agent to monitor flights to Dublin and book automatically if a preferred airline drops below €60).

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While Stages 1 & 2 are customer-authorised checkouts similar to today's e-commerce, in Stage 3, where a transaction is executed within the scope of parameters originally authorised by the user (such as amount, validity period, or purpose), it should also be capable of being treated as authorised and authenticated under existing frameworks without requiring further user intervention. The upfront authorization event is conceptually aligned with established models such as direct debit mandates and Merchant-Initiated Transactions. The authentication event happens at the authorization of the mandate and pre-authorization enables downstream pull-based activity. Such mandates can also cover transactions where the amount is not predefined, as in the case of utility bills, while still being subject to defined parameters such as a cap on the total transaction size. Accordingly, the record of events would potentially include that pre-authorization that includes the scope of parameters, in addition to what would be captured in Stage 2.

An adaptable approach to regulation

To realise the economic potential of agentic commerce while preventing fraud and protecting privacy, the regulatory treatment of agentic commerce stages must reflect the technical and commercial reality of the transactions, as they develop, rather than anchoring compliance obligations to static stage definitions. Across all the stages outlined above, existing regulatory frameworks remain fully applicable. Existing payment frameworks already allocate dispute costs based on which party controlled the point of failure, and as with prior payment innovations, the market has consistently worked out a proportionate balance without prescriptive intervention, consistent with existing card scheme rules and payment service provider agreements. We therefore do not expect the introduction of AI assisted commerce to, in itself, require significant regulatory changes around the allocation of dispute costs between consumers, merchants, payment service providers or underlying payment infrastructures.

Structural Compatibility with Current Frameworks

- **Payment Method Neutrality and Consumer Rights:** The introduction of agentic assistance should not alter the consumer's fundamental rights and the user should be able to leverage the standard dispute and refund mechanisms native to their chosen payment method. The use of AI assistance within the commerce journey should not reduce or displace the consumer protections that exist within the current payments' ecosystem.
- **Continuity of the Commercial Relationship:** The introduction of agentic assistance preserves the direct commercial relationship between the consumer and the seller. As long as the agent acts solely as a technical facilitator rather than a transacting party to the transaction, established merchant responsibilities – including fulfilment, refunds, and, existing customer protections and dispute resolution mechanisms native to the chosen payment method remain the appropriate reference point, ensuring customers retain familiar protections without imposing disproportionate new requirements on sellers. Fulfilling an agent-assisted transaction should not fundamentally alter a merchant's existing obligations. That said, given the nascent nature of agentic use cases, these frameworks must remain flexible, evolving as the technology matures to address novel or edge cases.
- **Role of the AI Interface:** Where the AI agent functions exclusively as a requirement gathering and product discovery tool for or on behalf of the user, the AI agent does not initiate payments and operates outside the flow of funds; established providers such as payment service providers therefore continue to own payment execution and regulatory compliance. This approach is intended to remain infrastructure-agnostic, allowing merchants to leverage their existing relationships with PSPs while the AI agent focuses solely on the secure transmission of standardised mandate data. As the market evolves, different models for agent involvement in payment flows may emerge - including those where agents play a more direct role in payment initiation. These should be evaluated on

a risk-proportionate basis within existing frameworks, consistent with the principles outlined above, rather than treated as categorically distinct from other agentic commerce models.

- **Governance Based on Open Standards and Interoperability:** The governance of agentic commerce experiences can be facilitated through open, interoperable standards rather than proprietary registries maintained by dominant networks or platforms. Closed 'trusted agent registries' risk fragmenting the agentic commerce ecosystem and concentrating market power in a small number of infrastructure incumbents

Since 2025, several prominent agentic payment protocols have emerged, addressing vital layers of the transaction stack, from identity verification and cryptographic authorization to HTTP-native settlement. While these protocols are typically complementary, they are not always interoperable, which could cause different integration paths for merchants and other stakeholders. As the landscape matures, open, outcome-based standards are likely to play a critical role to help ensure these layers can function together seamlessly, preserving choice for users, merchants, PSPs and TSPs. Governance of these standards should be representative of all ecosystem participants.

- **User Privacy and Data Protection:** Agentic experiences must not compromise user privacy. To protect this, agentic experiences should secure the data necessary to safely execute the transaction (e.g. cryptographically protect data required by the merchant and PSP), and should provide transparency to users regarding what data is shared. Information regarding a user's private communications and broader interactions within their AI agent should remain separate from payments flow to reduce unnecessary exposure of sensitive personal or behavioural data.

Conclusion

Agentic payments provide a pathway to significantly enhance digital commerce, increase consumer convenience, drive economic growth, and offer new service opportunities to merchants while also creating opportunities for greater efficiency, competition and innovation across the European payments system.

To realise these benefits safely within the European payments landscape, innovation must develop in a manner that remains compatible with existing regulatory frameworks, preserves strong consumer protections and maintains clear liability structures.

By preserving existing principles, e.g. for Merchant-Initiated Transactions under SCA, the safe adoption of agentic commerce may be enabled without requiring fundamental changes to existing regulatory perimeters.

These guiding principles for payments in agentic experiences aim to provide a practical pathway for policymakers and industry to support innovation in agentic commerce while maintaining consumer trust, operational resilience and the integrity of the broader European payments ecosystem.

About EPIF

By way of background EPIF was created in July 2011 to represent the interests of the non-banking Payment Institutions at the European level. Directly and indirectly EPIF represents roughly 250 payment institutions in Europe covering a range of business models. EPIF brings together European and international companies in the remittance sector, three party card schemes, third party providers, cross-border acquirers, payment processors, electronic payment providers, fx traders, electronic wallet providers and operators of mobile payments.