



European Retail
Round Table



To:

M. Benoît Coeuré
Member of the Executive Board
European Central Bank

Mr. Jonathan Faull, Director General
Internal Market and Service DG
European Commission

Dear M. Coeuré,
Dear Mr. Faull,

Re EU SEPA Council 25 June: Stakeholder representation

The SEPA Council stakeholders and the members of the End-users Committee write further to the EU SEPA Council of 25 June and the exclusion of the retail sector (EuroCommerce/ERRT) from participation. We wish to record our concerns at the arrangements for stakeholder representation in the EU SEPA Council.

We reiterate that EuroCommerce/ERRT made strenuous efforts to find a representative who would satisfy the EU SEPA Council rules. When they were unable to do so, they proposed that the Director General of EuroCommerce should, in this one instance, although he had not been formally accepted as an alternate, attend to represent retail along with the EU SEPA Council expert. By letter of 21 June 2012, EuroCommerce/ERRT were informed that under the rules of the SEPA Council's mandate, neither the Director General nor the expert would be allowed to attend. We would make the following points:

- The mandate rules are not consistently applied amongst the stakeholders.
- There is a lack of common-sense flexibility in the application of the rules which can prevent the proper participation of significant sectoral interests.
- No provision is made for attendance of the expert as observer should the member not be able to attend.

We of course respect the need to maintain the high-level nature of the members at the EU SEPA Council. However, we insist that this must be balanced with finding members who are sufficiently knowledgeable of the policy and legislative issues being discussed. We point out that while

developments in SEPA are likely to be part of the day-to-day work of many high-level bankers, this is not the case for many retail CEOs or CFOs. The result is that there is an imbalance in the expertise of the payment user and provider members of the Council.

Our second point is the need for pragmatism: it is surely better that a significant sector such as retail be represented by the most qualified individual available than not represented at all. We also fail to see the point in excluding the accredited expert, even as an observer, to report back to their respective sector. We strongly request that, in the future, this should be allowed.

The end-users have to date been supportive of the EU SEPA Council. We have proposed that in a revised SEPA governance system, some similar body should persist as long as some changes are made. We therefore close with a set of expectations which should be put in place to secure the full support of the user community:

- The fair and balanced representation of users must be enshrined in the mandate.
- A sector must be free to propose whatever individuals they regard as the most suitable persons as member and alternate member having due regard to their seniority and their level of expertise.
- These rules must be open, transparent and applied to all equally.
- If neither the member nor the alternate is available to attend the accredited expert should attend meetings as observer.

We would further suggest that a meeting of the technical experts should be organized prior to the next Council meeting on 14 December to discuss the issues raised above and to consider the agenda of the December meeting itself.

Yours sincerely,

Christian Verschueren, EuroCommerce

Dennis Kredler, ERRT

Monique Goyens, BEUC

Richard Raeburn, EACT

Andrea Benassi, UEAPME