



Electronic Money Association
Surbiton
Surrey
KT6 4BN
United Kingdom
Telephone: +44 (0) 20 8399 2066
www.e-ma.org

Digital Regulation Cooperation Forum
Ofcom
Riverside House,
2a Southwark Bridge Rd,
London SE1 9HA

By email to: DRCF@ofcom.org.uk

27 January 2023

Dear Sir/Madam

Re: Digital Regulation Cooperation Forum Call for Input on the Digital Regulation Cooperation Forum workplan 2023 to 2024

The EMA is the EU trade body representing electronic money issuers and alternative payment service providers. Our members include leading payments and e-commerce businesses worldwide, providing online payments, card-based products, electronic vouchers, and mobile payment instruments, open banking payments, and cryptoasset services. A list of current EMA members is provided at the end of this document. The EMA has been operating for over 20 years and has a wealth of experience regarding the regulatory framework for electronic money and payments.

We welcome the opportunity to comment on the DRCF workplan 2023 – 2024.

The EMA would welcome if the DRCF could consider including work to support the implementation of the UK's Smart Data regime under its 2023-24 workplan. We believe that once the underlying legislative framework¹ for the Smart Data regime progresses through Parliament there will be critical need for the DRCF to coordinate and align policy work and

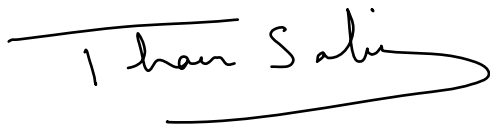
¹ <https://bills.parliament.uk/bills/3322>

implementation projects as Smart Data schemes emerge in different sectors. For instance, DRCF's goals of promoting coherence and greater collaboration amongst regulators could help accelerate developments in Open Finance which the Smart Data regime may allow.

We recognise that the Joint Regulatory Oversight Committee (JROC)² is responsible for overseeing the development of the vision and strategic roadmap for Open Banking in the UK. However, Open Finance will reach beyond the current boundaries of open banking, and will likely require cooperation amongst a broader group of regulators to achieve successfully implementation. For these reasons, we believe that DRCF should consider including a workstream to support the Smart Data regime in 2023-24.

Thank you for taking our comments into consideration.

Yours faithfully



Dr Thaer Sabri
Chief Executive Officer
Electronic Money Association

² <https://www.fca.org.uk/firms/future-open-banking-joint-regulatory-oversight-committee>

ANNEX II: List of EMA members as of January 2023:

[AAVE LIMITED](#)
[Account Technologies](#)
[Airbnb Inc](#)
[Airwallex \(UK\) Limited](#)
[Allegro Group](#)
[Amazon](#)
[American Express](#)
[ArcaPay Ltd](#)
[Banked](#)
[Bitstamp](#)
[BlaBla Connect UK Ltd](#)
[Blackhawk Network EMEA Limited](#)
[Boku Inc](#)
[Booking Holdings Financial Services International Limited](#)
[BVNK](#)
[CashFlows](#)
[Checkout Ltd](#)
[Circle](#)
[Citadel Commerce UK Ltd](#)
[Contis](#)
[Corner Banca SA](#)
[Crypto.com](#)
[Curve](#)
[eBay Sarl](#)
[ECOMMPAY Limited](#)
[Em@ney Plc](#)
[emerchantpay Group Ltd](#)
[Etsy Ireland UC](#)
[Euronet Worldwide Inc](#)
[Facebook Payments International Ltd](#)
[Financial House Limited](#)
[First Rate Exchange Services](#)
[FIS](#)
[Flex-e-card](#)
[Flywire](#)
[Gemini](#)
[Global Currency Exchange Network Limited](#)
[Globepay Limited](#)
[GoCardless Ltd](#)
[Google Payment Ltd](#)
[HUBUC](#)
[IDT Financial Services Limited](#)
[Imagor SA](#)
[Ixaris Systems Ltd](#)
[MANGOPAY](#)
[Modulr FS Europe Limited](#)
[MONAVATE](#)
[Moneyhub Financial Technology Ltd](#)
[Moorwand](#)
[MuchBetter](#)
[myPOS Payments Ltd](#)
[NOELSE PAY](#)
[NoFrixion Ltd](#)
[Nuvei Financial Services Ltd](#)
[OFX](#)
[OKTO](#)
[One Money Mail Ltd](#)
[OpenPayd](#)
[Own.Solutions](#)
[Papaya Global Ltd](#)
[Park Card Services Limited](#)
[Paymentsense Limited](#)
[Paynt](#)
[Payoneer Europe Limited](#)
[PayPal Europe Ltd](#)
[Paysafe Group](#)
[Paysend EU DAC](#)
[Plaid](#)
[PPRO Financial Ltd](#)
[PPS](#)
[Ramp Swaps Ltd](#)
[Remitly](#)
[Revolut](#)
[Ripple](#)
[Sable International FX Limited](#)
[Securiclick Limited](#)
[Skrill Limited](#)
[Soldo Financial Services Ireland DAC](#)
[Square](#)
[Stripe](#)
[SumUp Limited](#)
[Swile Payment](#)
[Syspay Ltd](#)
[Transact Payments Limited](#)
[TransferMate Global Payments](#)
[TrueLayer Limited](#)
[Trustly Group AB](#)
[Uber BV](#)
[VallettaPay](#)
[Vitesse PSP Ltd](#)
[Viva Payments SA](#)
[Weavr Limited](#)
[WEX Europe UK Limited](#)
[Wirex Limited](#)
[Wise](#)
[WorldFirst](#)
[WorldRemit LTD](#)
[Yapily Ltd](#)