



**Electronic Money Association**

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APP Scams  
Payment Systems Regulator  
12 Endeavour Square  
London  
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18 June 2024

Dear Sir/Madam

**Re: EMA response to PSR voluntary questionnaire on police reporting**

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. Most members operate in the UK and the EU, as well as globally. A list of current EMA members is provided at the end of this document.

I would be grateful for your consideration of our comments and proposals.

Yours sincerely,

A handwritten signature in black ink that reads 'Thaer Sabri'. The signature is written in a cursive style and is underlined with a long horizontal stroke.

Dr Thaer Sabri  
Chief Executive Officer  
Electronic Money Association

## EMA response:

### PSR voluntary questionnaire on police reporting of APP scams

We have circulated and discussed this questionnaire and would like to present the consensus view of Electronic Money Association Members.

There was an overwhelming concern of EMA Members to ensure that consumers, as victims of crime, co-operate and provide reports and evidence to support law enforcement action.

One unintended consequence of prompt APP Scam Reimbursement of victims is that the incentive to report and further co-operate is diminished, such that law enforcement action against criminals will be severely hampered.

This is clearly not a desirable outcome and runs contrary to the intentions of the UK Fraud Strategy 2023 and the APP Scam Reimbursement Scheme.

EMA Members thus support amending the **Consumer Standard of Caution** to make crime case reporting and co-operation by victims a requirement in order to qualify for compensation. This obligation is considered a fair contribution by victims in reflection of the compensation provided to victims by the payments industry.

We foresee significant benefits to fraud prevention and law enforcement from this approach:

- More timely crime reporting by victims;
- Provision of a more comprehensive and rich data set for:
  - Police intelligence and prioritisation; and
  - Training AI fraud risk modelling and scoring.

A comprehensive set of APP scam crime reports collated centrally will allow for better identification of organised criminal modes of operation and threat vectors. This would facilitate more timely fraud prevention interventions and law enforcement action.

## Members of the EMA, as of June 2024

Airbnb Inc  
Airwallex (UK) Limited  
Allegro Group  
Amazon  
Ambr  
American Express  
ArcaPay UAB  
Banked  
Bitstamp  
BlaBla Connect UK Ltd  
Blackhawk Network EMEA Limited  
Boku Inc  
Booking Holdings Financial Services International Limited  
BVNK  
CashFlows  
Circle  
Coinbase  
Contis  
Crypto.com  
Currenxie Technologies Limited  
Decta Limited  
eBay Sarl  
ECOMMPAY Limited  
Em@ney Plc  
emerchantpay Group Ltd  
EPG Financial Services Limited  
eToro Money  
Etsy Ireland UC  
Euronet Worldwide Inc  
Facebook Payments International Ltd  
Financial House Limited  
First Rate Exchange Services  
Flywire  
Gemini  
Globepay Limited  
GoCardless Ltd  
Google Payment Ltd  
IDT Financial Services Limited  
iFAST Global Bank Limited  
Imagor SA  
Ixaris Systems Ltd  
J. P. Morgan Mobility Payments Solutions S. A.  
Lightspark Group, Inc.  
Modulr Finance B.V.  
MONAVATE  
MONETLEY LTD  
Moneyhub Financial Technology Ltd  
Moorwand Ltd  
MuchBetter  
myPOS Payments Ltd  
Navro Group Limited  
Nuvei Financial Services Ltd  
OFX  
OKG Payment Services Ltd  
OKTO  
One Money Mail Ltd  
OpenPayd  
Own.Solutions  
Park Card Services Limited  
Payhawk Financial Services Limited  
Paymentsense Limited  
Paynt  
Payoneer Europe Limited  
PayPal  
Paysafe Group  
Paysend EU DAC  
Plaid  
PPRO Financial Ltd  
PPS  
Push Labs Limited  
Ramp Swaps Ltd  
Remitly  
Revolut  
Ripple  
Securiclick Limited  
Segpay  
Soldo Financial Services Ireland DAC  
Square  
Stripe  
SumUp Limited  
Syspay Ltd  
Transact Payments Limited  
TransferGo Ltd  
TransferMate Global Payments  
TrueLayer Limited  
Uber BV  
VallettaPay  
Vitesse PSP Ltd  
Viva Payments SA  
Weavr Limited  
WEX Europe UK Limited  
Wise  
WorldFirst  
Worldpay  
Yapily Ltd