

Agenda

Netherlands Electronic Money Association meeting

12.00 - 14.00 CEST, 17 April 2024

Vijzelstraat 68-78, 1017 HL Amsterdam, Netherlands

- (1) Approval of the meeting [minutes](#) of 30 November 2022;
- (2) [EU Financial Data and Payments Package](#); EMA update on EMA outreach with Member States , and discussion in Council Working Party of key topics, including:
 - a. Definition of e-money;
 - b. Cross-border provisions, treatment of distributors and agents;
 - c. Access to bank accounts;
 - d. Prudential requirements, including safeguarding;
 - e. Open banking provisions.
- (3) Supervision; discussion regarding final guidance:
 - a. DNB [Good Practice intra-group relations](#) for EMIs and PIs, published in January 2024: financial intra-group relationships, agreements and positions between EMI, PIs and other group entities can pose a threat to the soundness of a supervised institution.
 - b. DNB [Q&A supervisory board](#) at PIs and EMIs, published in January 2024: under what circumstances can the establishment of a supervisory board at a PI or EMI be necessary to ensure controlled business operations and a balanced and adequate organisational structure; [Final Q&A](#) published following a consultation in October-November 2023.
 - c. [DNB Q&A independence of the supervisory board at EMIs](#); and [Q&A independence of the supervisory board at PIs](#), published in March 2024: draft Q&A on Independence of the Supervisory Board was consulted on from 14 July to 30 September 2023. With this [publication](#) of the final Q&A, the policy statement of 24 June 2019 'Independent functioning of the Supervisory Board: DNB position' is canceled.

Electronic Money Association

Crescent House 5 The Crescent Surbiton Surrey KT6 4BN

T 020 8399 2066 F 020 8390 7518 W www.e-ma.org

(4) Member discussion on the current issues:

- a. [CESOP](#) reporting; EMA letter to European Commission.

Regulatory updates:

- AMF [DORA Update: develop ICT risk management](#) framework (March 2024); The Dutch Authority for the Financial Markets issued its third publication explaining the key aspects of the Digital Operational Resilience Act, focusing on ICT risk management.
- [FIU Knowledge Update: Illegal purchase of dual-use goods](#); (February 2024); *“The sanction packages are extensive and apply, among other things, to dual-use goods. These are goods that have both civil and military purposes, for example certain microelectronics. We regularly hear that institutions have difficulty detecting possible avoidance of these types of sanctions.”*