Comments:

Q1. Do you agree with the features and categories of digital fraud? Are there additional financial stability and/or prudential transmission channels from digital fraud to the banking system?

Savings fraud is considered as Category 3 (Digital fraud related to bank customers' other banking products) includes savings fraud while this could also be considered in category 2 Digital fraud related to online payment instruments: manipulation of the payer to issue a payment order) because it is a payment to an external account (and not for a product within the bank of the customer).

The regulatory discussions about the European Payment Service Regulation (PSR) risk to extend the reimbursement obligation to category 2. This liability shift to banks for category 2 is not justified.

Q2. What other data sources could the Committee consider when assessing the risks of digital fraud?
The ECB publishes card payment fraud statistics.
The European Central Bank (ECB) collects each half year comprehensive fraud data from all payment service providers in the European Union and could publish the results.

Q3 Are there any additional, banking-specific, initiatives on digital fraud that could be pursued by the Committee?

The European Payment Service Directive (PSD2) and its complimentary Regulatory Technical Standards (RTS) include many digital fraud mitigation obligations.
The successor of PSD2 the European Payment Service Regulation (PSR) and PSD3. The regulatory discussions about the PSR include sharing of account numbers linked to suspicious fraudulent payments and collaboration with telecom providers.

The Euro Retail Payments Board (ERPB) has set up in August 2023 a working group with the participation of relevant stakeholders to analyse developing trends in fraud related to retail payments and define on this basis a set of possible actions for actors involved in the payment chain.