



### Background

On 2 July 2025, the Dutch Central Bank (“**DNB**”) issued a [press release](#) announcing two (**2**) changes to the prudential reports (“**FINREP**”) that payment institutions (“**PIs**”) and electronic money institutions (“**EMIs**”) are required to submit. At the same time, DNB published a revised version of the [Prudential Reporting Manual](#). Although DNB does not specify the effective date of the amended reporting rules, it appears they must be observed from the next applicable reporting date.

### Amendments to Gross Provision Income

In the updated Prudential Reporting Manual concerning FINREP submissions by PIs and EMIs, DNB clarifies that the item “gross provision income” (*bruto provisie-inkomsten* (**T80.01 row 0090**)) must also include income derived from holding third-party funds (*derdengelden*). Accordingly, the figure reported as gross provision income in the FINREP (**T80.01 row 0090**) should encompass the following sources of income:

- I. Commissions and fees** for providing regulated payment services;
- II. Interest income on third-party funds;**
- III. Other income from services related to payment services**, these are services that may not be provided without a licence.

As an example of point (II), DNB states that interest income derived from third-party funds held in an account of a foundation for third-party funds (*stichting derdengelden*) must be included.

### Reporting of third-party funds

As of 2024, third-party funds must be reported on a separate tab in the FINREP (**T83.00**). DNB has observed that some PIs and EMIs continue to (erroneously) include these funds under other tabs. DNB reminds PIs and EMIs that all items relating to third-party funds must be reported exclusively on tab T83.00.

**Next Steps:** PIs and EMIs should verify whether they are correctly reporting third-party funds and related income and should – where necessary – correct any reporting errors.



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