



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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