

Unclassified

English - Or. English

18 May 2026

**DIRECTORATE FOR FINANCIAL AND ENTERPRISE AFFAIRS  
COMPETITION COMMITTEE**

**Summary of Discussion of the Roundtable on Competition in Mobile Payment Services**

**Annex to the Summary Record of the 146th Meeting of the Competition Committee**

18 June 2025

This document prepared by the OECD Secretariat is a detailed summary of the Roundtable on Competition in Mobile Payment Services, held by the Competition Committee on 18 June 2025. It presents a factual summary of the views expressed by speakers and delegations that intervened during the discussion.

More documents related to this discussion can be found at:  
<https://www.oecd.org/en/events/2025/06/competition-in-mobile-payment-services.html>

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**JT03587113**

## *Summary of Discussion of the Roundtable on Competition in Mobile Payment Services*

On 18 June 2025, the OECD Competition Committee held a roundtable to discuss competition in Mobile Payment Services chaired by Mr Benoît Cœuré, President of the Autorité de la concurrence.

The session was opened by the **Chair**, who welcomed participants to the roundtable on competition in mobile payment services. The Chair expressed satisfaction in chairing this session, noting its significance as the first substantial meeting under their leadership. The Chair outlined the rationale for focusing on mobile payments, emphasising the sector's relevance to citizens' daily lives and its centrality to the mission of competition authorities, namely, improving consumer welfare. The payment industry, the Chair observed, has undergone profound disruption over the past decade, with innovations affecting both the front-end (such as mobile interfaces) and the back end (including distributed ledger technologies and stablecoins). Despite this disruption, incumbents remain strong in many jurisdictions, raising complex questions for competition policy. The Chair explained that the session would be divided into three parts: an overview of the mobile payments landscape, a discussion of competition risks, and an exploration of competition opportunities. Three expert speakers were introduced: Iota Nassr (OECD), Jon Frost (Bank for International Settlements), and Rune Garborg (Vipps Mobile Pay). The Chair encouraged lively and interactive participation, inviting interventions from all attendees.

Director **Carmin De Noia** followed with introductory remarks, congratulating the new chairs and highlighting the importance of horizontal policy discussions within the OECD. Director De Noia described mobile payments as emblematic of the broader digital transformation in financial services, noting their increasing centrality to economic life and their intersection with technology, platforms, and financial institutions. He stressed that mobile payments do not fit neatly into traditional regulatory categories, instead cutting across boundaries between competition authorities, financial supervisors, data protection agencies, and digital regulators. This complexity, Director De Noia argued, necessitates a collaborative, cross-disciplinary approach to policy and enforcement. Efficient and competitive payment systems, he asserted, are the backbone of economic activity, with the potential to reduce transaction costs, support financial inclusion, and foster long-term growth. Director De Noia concluded by urging competition authorities to play a proactive role in shaping market structures to ensure contestability and innovation, rather than merely responding to market failures.

The Chair gave the floor to the **Secretariat**. The Secretariat presented the main takeaways from the background note, focusing on retail mobile payments at physical stores, online checkouts, and peer-to-peer transactions. The Secretariat explained that mobile payments are now the fastest-growing payment method globally, driven by convenience and the unbundling of traditional banking functions. This unbundling has made parts of the payment stack contestable, opening the market to new entrants and fostering innovation. However, the Secretariat cautioned that these developments have not yet translated into improved competition, with incumbents still controlling the retail-level payment rails in most jurisdictions. The analogy of payment rails was used to illustrate how banks and card networks continue to own the infrastructure that routes payment instructions and sets rules and fees, even as fintechs introduce new interfaces. In some countries, mobile payment providers have leapfrogged traditional rails, promoting financial inclusion but also creating new forms of market power.

The Secretariat identified several key competition risks. Mobile payments, like other digital markets, are characterised by network effects, switching costs, and data advantages, with big tech firms benefiting from deep ecosystem integration and unrivalled access to user data. Vertical integration into larger ecosystems raises the risk of market tipping, not only in payments but also in adjacent markets. Control over essential technologies, such as NFC functionality, mobile operating systems, and telecom networks, can raise barriers to entry and enable exclusionary practices, including foreclosure, bundling, and self-referencing. Traditional concerns, such as anti-steering rules and most-favoured-nation clauses, also persist, limiting merchant and user choice. Partnerships between new entrants and incumbents may reduce rivalry and steer innovation in ways that reinforce incumbent advantages, making merger control and scrutiny of cooperation essential. Regulatory bottlenecks and fragmentation can further raise barriers, but pro-competitive regulation has enabled dynamic entry in some jurisdictions.

Opportunities for competition were also discussed. The Secretariat highlighted open banking and data portability, interoperability, reciprocal data access, and the development of alternative retail-level rails, sometimes supported by central banks, as promising directions. The importance of context was stressed: concentrated markets may require prescriptive rules, while facilitative approaches may be more suitable elsewhere. Timing is critical, as mandating interoperability too early can stifle innovation, while acting too late risks market tipping. Addressing data asymmetries and ensuring open access to infrastructure were identified as key elements, with enforcement and regulation needing to complement each other to address market failures and bottlenecks. The Secretariat concluded that mobile payment services offer a real opportunity to shift the competitive paradigm in retail finance, but without effective enforcement and regulatory frameworks, there is a risk of entrenching incumbent power or shifting it to new closed ecosystems.

Following the Secretariat's presentation, the Chair gave the floor **Iota Nassr** (OECD). Iota Nassr provided a broader perspective on the digitalisation of finance, emphasising the transformational impact on the financial sector and the need for a horizontal approach among authorities. Nassr outlined the multiple policy objectives at play, including financial stability, market integrity, consumer protection, innovation, and financial inclusion. The speaker stressed the importance of avoiding regulatory fragmentation and arbitrage, particularly at the international level. Examples were given of regulatory safeguards, such as anti-money laundering controls and oversight frameworks, which apply to both incumbents and new entrants. Operational resilience, especially the reliance on a concentrated number of third-party service providers, was highlighted as a systemic risk. The benefits of mobile payments for financial inclusion were illustrated with examples from Kenya and Zambia, though concerns about dependency and market control remain. Consumer protection was identified as a front-of-mind issue, with the OECD's high-level principles on financial consumer protection updated to reflect the growing importance of digital finance. Data centrality was emphasised, with ongoing projects on transparency in cross-border payments and remittances, and the importance of data privacy in digital finance.

The Chair then called on **Italy** that described the evolving digital payment landscape in Italy, where traditional banks remain dominant but non-bank players are increasingly entering the market. The authority's approach combines enforcement and advocacy, with a focus on consumer protection. Key cases included the merger between Nexi and SIA, which was approved only after securing commitments to end exclusivity, ensure transparent pricing, and promote competition. The authority also addressed exclusionary practices by Mastercard and blocked fee structure changes in the Bancomat network that would have limited competition. Vigilance regarding big tech payments, data access, and interoperability was stressed. Advocacy efforts included clarifying regulations to ensure

neutrality and openness in public payment platforms, and interventions to protect consumers from aggressive practices by banks and unfair surcharges on digital payments. The authority's commitment is to fostering a payment market that is innovative, competitive, and fair, guided by transparency, neutrality, and consumer respect.

**Kenya** presented their experience with Safaricom, a vertically integrated company, dominates the mobile payment market through its M-PESA platform, benefiting from network effects and a large customer base. The authority has intervened to address discriminatory pricing in USSD services, reducing costs and increasing transparency, and to regulate the digital credit market in response to consumer complaints. Recommendations included transferring regulatory responsibility to the Central Bank of Kenya to protect consumers and open the market to new players.

The **Philippines'** competitive landscape was described as dynamic, with rapid growth in mobile wallets, digital transactions, and digital banking. The market includes numerous licensed electronic money issuers, banks, non-bank financial institutions, and fintech companies. The lifting of a moratorium on new licences is expected to increase competition, with government efforts focused on promoting financial inclusion and improving security. The Philippine Competition Commission has reviewed mergers to ensure continued innovation and prevent excessive concentration, including a recent case involving the merger of clearing switch operators. Voluntary commitments were required to address concerns about fees, service quality, and innovation, with the Central Bank playing a key role in supporting the transaction.

The Chair then turned to the expert speakers.

**Jon Frost** (Bank for International Settlements) discussed the risks to competition in mobile payments, drawing on global research and examples from the Americas. Frost distinguished between fintech firms, which focus on specific financial services, and big tech firms, which leverage data from multiple business lines. The adoption of fintech and big tech apps has increased competition, but there is a risk of consolidation and the emergence of new dominant players. Mergers and acquisitions by large firms have raised concerns about concentration. Remedies discussed included the introduction of fast payment systems, often operated by central banks, which have driven rapid uptake and financial inclusion in countries such as Brazil and Costa Rica. Public sector-operated systems tend to see greater adoption, as central banks have mandates to promote the public good and ensure open access. Open banking initiatives, such as account switching services in the UK, have also fostered competition. Frost concluded that while fintech and big tech entrants have increased competition, regulatory intervention is necessary to prevent consolidation and safeguard competition. Public infrastructures and open finance hold promise, but ongoing evidence collection and policy development are needed.

**Rune Garborg** (Vipps MobilePay) began by emphasising the rapid transformation in the payment space over the past decade, noting that the pace of change is accelerating, particularly due to advancements in artificial intelligence. He highlighted that four of the seven largest global companies are now engaged in payments, leveraging data as a strategic asset. This shift has fundamentally altered the competitive landscape, with banks—once dominant players—now facing significant challenges from technology giants.

Garborg described the Nordic market, where his company operates a wallet service with 12 million users and 350,000 merchants, facilitating over ten transactions per user per month. He observed that cash usage has dwindled to negligible levels, especially in Norway, and predicted that mobile phone payments would soon surpass card payments, particularly among younger consumers who are abandoning physical cards altogether. The competitive dynamics have shifted, with local banks now relatively small players compared

to global tech firms like Apple, whose market capitalisation dwarfs that of the largest European banks. The entry of Apple into the in-store payment market has had a substantial spillover effect on e-commerce, consolidating its position in both domains.

Garborg celebrated the recent opening of the NFC antenna on iPhones, which enabled competitors to enter the market and fostered a more level playing field. His company was the first to offer mobile payments on iPhones in Norway, and uptake was immediate, with one million downloads in a country of 5.5 million people. He stressed the importance of interoperability, citing ongoing initiatives across Europe to connect wallets in Greece, Italy, Spain, Portugal, and the Nordics, aiming to create a pan-European interoperable wallet serving over 100 million users. However, he identified persistent barriers to competition, including high margins for terminal providers, restrictive ownership structures, and limited cross-border scaling. Garborg called for banks to embrace interoperability, arguing that it would simplify payments for consumers and expand the market rapidly if there were sufficient will.

He concluded by noting that the current model makes it too costly to issue and use alternative payment solutions, with negative consequences for consumers and innovation. The battle for control of the customer interface is fierce, and unless European banks adapt, they risk losing out to international players. Garborg advocated for swift implementation of digital identity frameworks and standardised access to mobile features, as well as public-private collaboration to create a European alternative to big tech payment solutions.

Following Garborg's remarks, the Chair introduced a **poll** to gauge delegates' views on the most significant competition challenges in the payment sector. The results indicated that market power of incumbents and issues of access and interoperability were the primary concerns, with less emphasis on the market power of new entrants and access to financial infrastructures. The session then moved to further country interventions.

**Mexico** described a market study on digital financial services, revealing that despite the growth of the fintech ecosystem, financial inclusion and competition remain limited. Half of Mexican adults lack bank accounts, and only a third have made digital payments. Barriers to competition include limited internet connectivity, low smartphone usage, cash-based preferences, and financial literacy challenges. Regulatory obstacles persist, with incomplete implementation of the 2018 fintech law and high entry costs for new players. Institutions specialising in mobile payments face stricter requirements than traditional banks, and no innovative models have been authorised under the law. The delegate emphasised the need for secondary regulation and more consistent application of existing rules to foster competition.

**Germany's** intervention focused on the issue of interchange fees and the ongoing case against PayPal's surcharging rules. The German authority argued that merchants should be able to pass on payment costs to customers transparently, enabling competition among payment methods. Prohibiting surcharging reduces incentives for payment schemes to lower fees, and the current legal framework lacks sufficient understanding of these economic dynamics. The case against PayPal centres on its prohibition of lower prices for cheaper payment methods, which the authority hopes to resolve before legislative changes are finalised.

**Switzerland** shared their experience with barriers to competition in mobile payments, noting early intervention against both Apple and Swiss banks. The banks had coordinated to prevent Apple Pay's entry, founding the national scheme TWINT, while Apple obstructed TWINT's use on iPhones. The Swiss authority issued interim measures against Apple, which were effective, and conducted raids on banks to force behavioural change. Without specific digital market regulation, traditional antitrust law proved crucial in

maintaining competition, resulting in a strong national player competing with big tech solutions.

**Norway's** contribution highlighted the importance of access to essential inputs like BankID and BankAxept for fostering competition and innovation. Remedies imposed during a 2018 merger were reassessed and extended, ensuring non-discriminatory access to these services. Vipps, the market leader, expanded into Denmark, Finland, and Sweden, while BankID and BankAxept were separated into independent companies. The Norwegian authority found that these inputs remain vital for new entrants, and ongoing assessments underscore their critical role in maintaining a competitive payment ecosystem.

The **European Commission** presented its analysis of risks and opportunities in the sector. It identified the disruptive potential of big tech and fintech entrants, the continued dominance of card-based payments, and barriers to entry such as must-have payment methods, costly technical standards, and strategic partnerships between card schemes, big tech, fintechs, and banks. These partnerships leverage financial infrastructure and network advantages, further restricting entry for alternative providers. The Commission expressed concern about ecosystems where big techs act as gatekeepers, tying merchants and consumers to their products.

The Apple Pay case was cited as an example of effective antitrust enforcement. The Commission found Apple dominant in the upstream device market and the aftermarket for NFC in-store payments on iPhones, controlling access for wallet developers. Remedies negotiated with Apple included free access to NFC, technical parity for new entrants, and explicit inclusion of account-based wallets and cross-border functionality. These commitments have led to significant market interest, with over 100 developers seeking licences and new entrants introducing innovative features such as split payments, cashback, real-time spending tracking, and pay-later options. The Commission stressed the importance of combining antitrust enforcement with regulation, ongoing research, and robust oversight to address structural risks and promote competition.

**Brazil** described the success of Pix, a public instant payment system designed to reduce costs, increase efficiency, and promote financial inclusion. Pix quickly overtook traditional payment methods and is now a public digital utility, with regulatory obligations ensuring its accessibility. Integration with global wallets is underway, but concerns remain about potential obstruction by Apple regarding NFC access.

**Portugal's** Competition Authority outlined its monitoring of the payments sector, identifying strategic, regulatory, and behavioural barriers to entry for fintech providers. An abuse of dominance case in 2024 found that a group owned by several banks tied access to its schemes to the use of its processing services, limiting choice for merchants and cardholders. Mobile wallets played a role in the anti-competitive strategy, and the authority stressed the importance of consistent monitoring and cooperation with regulatory bodies.

**Chinese Taipei** reported rapid growth in non-cash payments, with international players entering the market and intensifying competition. Investigations found no violations by Google Pay and Samsung Pay, as their technologies were accessible and non-discriminatory. Apple Pay, however, denied NFC access to rivals, but the authority concluded that Apple's market share was insufficient to hinder competition, and alternative payment methods such as QR codes were widely available and popular. QR code technology emerged as the dominant payment method, offering broad accessibility and integration with loyalty programmes.

**Japan** discussed the challenges of accessing banks' core systems for code-based payment services. The lack of standardised API specifications led to reliance on the CAFIS infrastructure, which had not revised its fees in over a decade. The Japanese authority

recommended fee reductions, which were implemented, lowering transaction costs and supporting the spread of mobile payments.

The session's thematic discussion focused on the interplay between innovation and market power in mobile payments. Speakers and country representatives repeatedly emphasised the dual nature of digital transformation: while new technologies and entrants can drive competition and financial inclusion, they also risk entrenching new forms of market power, particularly when network effects and data advantages are leveraged by large incumbents or big tech firms. The importance of regulatory frameworks that balance innovation with contestability was a recurring theme. Several speakers highlighted the need for proactive merger control, scrutiny of partnerships, and the development of open, interoperable infrastructures to prevent market tipping and exclusionary practices.

The role of central banks and public infrastructures was discussed in detail, with evidence presented that public sector-operated fast payment systems tend to achieve greater uptake and promote competition more effectively than private sector alternatives. The Brazilian Pix system and Costa Rica's SINPE Móvil were cited as successful examples, both having driven rapid adoption and financial inclusion while reducing reliance on cash. The importance of low transaction costs, immediate fund availability, and open access were identified as key factors in the success of these systems.

Open banking and data portability were also highlighted as promising avenues for fostering competition. By enabling users to control their data and switch providers more easily, open banking initiatives can reduce lock-in and level the playing field. However, speakers cautioned that timing and context are critical: mandating interoperability or data sharing too early can stifle innovation, while acting too late can allow markets to tip and become difficult to remedy.

The roundtable underscored the need for competition authorities to adopt a forward-looking, collaborative approach to regulation and enforcement. The complexity of mobile payments, which intersect with multiple regulatory domains, requires coordination between competition authorities, financial supervisors, data protection agencies, and digital regulators. Speakers advocated for horizontal policy discussions and cross-disciplinary collaboration to address the multifaceted challenges posed by digital transformation.

Enforcement and advocacy were identified as complementary tools. While enforcement is necessary to address exclusionary practices, mergers, and market failures, advocacy can help shape regulatory frameworks and promote contestability. The experiences shared by Italy, Kenya, and the Philippines illustrated the diversity of approaches and challenges faced by competition authorities worldwide, highlighting the importance of context-specific solutions.

Consumer protection emerged as a central concern, with speakers emphasising the need to safeguard consumer rights, ensure transparency, and prevent unfair practices. The rapid digital transformation of payments brings both benefits and risks, including the potential for loss of consumer choice, aggressive commercial practices, and data privacy concerns. Competition authorities were urged to remain vigilant and proactive in addressing these risks.

The session concluded with final remarks from the speakers. Jon emphasised the importance of international collaboration among authorities and central banks. Rune advocated for continued support for cost-reducing innovation and maintaining a level playing field between large players and the rest of the market, praising the work of the European Commission. Iota reiterated the value of inter-agency and cross-border cooperation in addressing the complex and interconnected environment of digital finance.

The Chair closed the session by thanking the speakers and the secretariat, noting the encouraging results of the final poll and expressing hope for continued progress in promoting competition and innovation in mobile payment services.