EPAA SUBMISSION TO

EMVCO REQUESTS FEEDBACK ON FRAMEWORK FOR SECURE, INTEROPERABLE AND SCALABLE CARD-BASED AGENTIC PAYMENTS

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EMVCo Requests Feedback on Framework for Secure, Interoperable and Scalable Card-Based Agentic Payments

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Submission of Emerging Payments Association Asia (EPAA) to EMVCo on the draft Agentic Payments Framework for Specifications, published 28 August 2026, comments due 30 September 2026.

Uploaded via https://www.emvco.com/contact/ (General / Agentic Payments)

1. Introduction

The Emerging Payments Association Asia (EPAA) welcomes the opportunity to provide feedback to EMVCo on the draft Agentic Payments Framework for Specifications, published 28 August 2026.

EPAA's goal is to unify the payments agenda in the Asia-Pacific region, drive business development, and improve the regulatory landscape for all organisations within the payments value chain. We are a community of payments organisations whose goal is to strengthen and expand the payments industry for the benefit of all stakeholders across the Asia-Pacific region. More information about EPAA can be found on our website www.emergingpaymentsasia.org

Please note that while we have consulted with our members and others within the ecosystem in the development of this submission, this submission is the view of EPAA alone and does not necessarily represent the views of individual EPAA Members, Supporters or Ambassadors.

As well, this submission is intended as general comments and observations on the concepts in the draft Agentic Payments Framework for Specifications, rather than necessarily proposing specific changes to paragraphs or clauses.

2. General Comments

EPAA appreciates the opportunity to comment on EMVCo's draft Agentic Payments Framework for Specifications. We welcome EMVCo's leadership in exploring early conceptual foundations for agent-mediated and delegated commerce, particularly as AI-driven agents begin to play a role in consumer purchasing and payment execution. The framework is a timely contribution to an area that is evolving rapidly and will require coordinated industry standards to ensure interoperability, security, and consumer trust.

EPAA similarly recognises the need for industry to understand and define how agentic payments and agentic commerce will operate generally. To this end, we have established an Agentic AI and Payments Working Group, which includes participation from major institutions, to examine how agent-mediated commerce will reshape consumer interactions, authentication, and payment execution.

Alignment across standards bodies will be critical to avoid divergent approaches and, on this basis, EMVCo's framework is an important contribution to ensuring that agentic payments are grounded in interoperability, transparency, and consumer choice.

EPAA recognises the benefit of EMVCo's objective of open and competitive ecosystems. As multiple agentic-commerce initiatives emerge, interoperability will become increasingly important. While EMVCo's remit is card-based payments, consistency across payment methods will matter as agents use cards, account-to-account transfers, and wallets interchangeably. That consistency is best achieved through shared outcomes and vocabulary developed in coordination with the standards bodies responsible for each rail, rather than by extending card-specific constructs to non-card systems.

Consumer intent is one of the most complex and consequential elements of agentic commerce. In our discussions with EPAA members, it was noted that intent may be expressed well before a transaction occurs, may evolve over time, and may involve conditional or parameter-based delegation to an agent. Depending on the market feedback to this consultation, EMVCo may choose to make the intent portion of the framework optional in favour of other issues that may be seen as more urgent. Whatever the intent mechanism, the framework should define the minimum record that must survive into the payment message and be available after the event: who acted, on whose authority, within what limits, and whether the consumer was present at the point of initiation.

The framework would benefit from a clearer distinction between consumer-present and autonomous transactions. In buyer-present commerce, where the consumer reviews and approves final terms, existing payment, authentication and consumer protection frameworks should remain applicable. Additional requirements should address risks introduced by the agent's involvement and avoid duplicating existing controls. EPAA recommends that Immediate Mode be defined as a distinct profile that records the consumer's approval, with autonomous-mode requirements applying only where justified by the transaction's characteristics and risks.

Similarly, the proposed Intent Service Provider (ISP) role represents a significant architectural component. In our discussions with EPAA members, it was noted that consideration needs to be given as to who will likely play this role and that this function should be scalable, globally interoperable and provider-agnostic. Merchants and agents should not be required to integrate with multiple proprietary intent-management systems. Clarifying the responsibilities, trust model and interoperability requirements of ISPs will be crucial for future specification work. The draft's examples and defaults appear to position payment systems as the natural operators of the Intent Service Provider, budget-state management and trust anchor functions. Future specifications should clarify whether these examples are illustrative or imply restrictions on who may perform each role. EPAA recommends that roles be defined by their functions and open to qualified participants that meet the relevant technical, security and governance requirements, including agents, wallets and merchants where appropriate.

The draft's suggestion that merchants do not need to know how a purchase is paid for does not reflect current practice. Merchants manage their payment mix - which methods and brands they accept, routing and cost - and should receive in an agentic transaction the same information they receive in a direct checkout. Selective disclosure should not withhold from merchants what they already have. The framework should also accommodate use cases where consumers pay with credentials stored with the merchant.

While consumer intent is worth consideration, there is a view amongst our members that a framework for merchants to recognise which agents they can trust through Know Your Agent (KYA) may be a more urgent issue requiring attention than intent. In many agentic scenarios, multiple agents may interact; for example, discovery agents, checkout agents, fulfilment agents, or platform-embedded agents. The framework should clarify who is responsible for identifying or authenticating an agent, how trust is established between agents, and how requirements can be designed to avoid excluding smaller providers or participants in emerging markets. Distinguishing genuine agents from malicious bots, for example those reserving inventory for high-demand event tickets or distorting pricing, makes KYA particularly pressing. It would help the wider ecosystem if EMVCo stated which elements it intends to specify (agent identification, the intent record, transaction indicators), which it defers, and in what order, so that parallel work across relevant standards bodies, such as the FIDO Alliance, and scheme Know Your Agent programmes framecan align rather than duplicate.

The framework should recognise at least two kinds of agent: operator-hosted agents, run by identifiable businesses capable of registration, and consumer-hosted agents, built by individuals or independent developers and often short-lived. Registration or qualification as a condition to transact would limit agentic commerce to established businesses and exclude the communities most likely to experiment. Baseline KYA requirements should focus on a stable pseudonymous identifier and an indication that an agent was involved. Any additional information should be proportionate to the role and risk, rather than making model or version details a routine condition of participation. These details change frequently, disclose implementation information, and could turn identification into a gatekeeping mechanism. Where a merchant has accepted an agent and the consumer's authority is verified through the intent, payment participants should avoid duplicating those checks while retaining the ability to meet applicable obligations and manage risks within their role. for merchants to recognising.

EPAA supports the framework's commitment to data minimisation and purpose limitation, but notes that as currently drafted these are guidelines rather than requirements, and the breadth of permitted purposes - including risk assessment and fraud prevention - allows participants to justify requesting data beyond their functional needs. Future specifications should define, for each role, the data it receives and the purposes for which it may use that data. Item-level cart details should remain outside what payment systems receive. Separately, the proposed prompt summary - a natural-language summary of the consumer's request - risks exposing sensitive personal context such as purchasing intent, health needs, or travel patterns to parties with no legal basis for processing it. If retained, it should remain between the agent and the consumer, with only the information necessary to resolve a post-transaction dispute disclosed to the relevant parties, subject to applicable data protection requirements.

More broadly, consumer experience and transparency will need to be central for agentic commerce to be adopted and trusted. Ideally, consumers should be able to understand and manage what they have authorised without requiring them to fathom the underlying technical infrastructure. Clear and consistent semantics for intent, constraints and lifecycle management will all be essential to achieving this.

Further, in discussions with our members it was noted that liability questions will inevitably arise where an agent acts outside a consumer's intended parameters or where incorrect information enters the transaction earlier in the commerce journey. While EMVCo's technical standards should not attempt to define commercial liability rules, the framework should acknowledge where technical design choices may influence liability allocation (e.g. requiring the merchant to check the verified intent) and ensure that EMVCo specifications do not inadvertently contribute to any confusion or ambiguity. In particular, the transaction data should make visible whether the consumer was present, absent within a valid mandate, or absent without one, since this distinction will be important in determining liability. We note that the framework correctly excludes agent accreditation, liability allocation, dispute procedures, and governance from its scope. We encourage EMVCo to ensure that nothing described as optional or deferred in the framework becomes a de facto requirement - through later specifications or citation in regulatory processes - without a fresh round of industry engagement.

Our other comments include:

- The number of verification checks the framework contemplates - at the agent, wallet, merchant, payment system, and directory service - exceeds what card e-commerce requires today. Each additional check introduces latency and failure points. EPAA recommends that the framework specify which party performs which check and enable downstream participants to rely on established authentication results where appropriate, avoiding unnecessary repetition while preserving checks needed to meet their own obligations and address distinct risks.
- The draft's approach to checkout binding - ensuring the executed payment corresponds to the approved checkout - relies on merchant-signed checkout records. Many smaller merchants, particularly in emerging markets, lack the cryptographic capability to produce these. The framework should provide an alternative path, treating merchant-signed binding as one mechanism among several, consistent with the principle of mechanism neutrality.
- Mandates, agent credentials, and revocation will operate across jurisdictions with distinct regulatory obligations on payment intermediaries, data handling, and consumer protection. The framework should specify the minimum data and verification elements that travel with a transaction and allow jurisdictions to layer additional requirements as their law requires, rather than building the most restrictive regime into the baseline. EPAA, given the regulatory diversity across our membership, considers this a priority area for future specification work.

3. Conclusion

EPAA welcomes this work by EMVCo and looks forward to further engaging as this work on Agentic Payments continues. We are also happy to brief EMVCo on the progress of our work through the Agentic AI and Payments Working Group as it progresses.

If you have any questions on this submission, please feel free to contact Dr Brad Pragnell, EPAA Ambassador and Senior Policy Adviser by email at brad.pragnell@34south45north.com .

Kind regards,
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