AQUASANDS

THE WOLF SERIES · Nº 11

The Payments Licence Playbook

EMI or payment institution, open banking, Singapore, the US and Canada: what each licence really allows, the capital it locks, and what starts the day after authorisation.

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EDITION NOVEMBER 2026

Stop being a pigeon.
Join the wolves.

BEFORE YOU READ

The licence follows the money. Not your pitch deck.

A regulator does not license an idea. It licenses what happens to your clients' money: who holds it, who moves it, who only looks at it. Get that sentence right and the file has a spine. Get it wrong and it is rebuilt.

WHAT YOU GET

- EMI, payment institution, AISP, PISP: which one your model needs.
- The EU and UK routes in one table, with capital and starting prices.
- Singapore, the US and Canada: how each regime is layered.
- Build or buy: your own licence, an agent route, or a white label.
- What follows authorisation, the seven traps, and a scorecard.

WHAT IT IS NOT

- Not a do-it-yourself kit. The status, country and file depend on *your* flows and clients, and are decided one to one.
- Not legal advice. It is general information, stated as at November 2026.
- Not a promise of a licence. The regulator alone decides; nobody serious guarantees it.

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WHAT YOUR MONEY ACTUALLY DOES

01

Four verbs decide your licence.

The pigeon asks “which licence is cheapest?” The wolf asks one question first: what does my product do with the client's money? Hold it, move it, read it, or lend it.

YOUR PRODUCT…	WHAT IT MEANS	STATUS TO AIM FOR
Holds a balance in the client's name	A wallet, a prepaid card, a funded payment account.	Electronic money institution (EMI)
Moves money, holds no balance	Executes payments without issuing electronic money.	Payment institution (PI)
Reads accounts, with consent	Aggregates a user's bank accounts and balances.	AISP, or RAISP in the UK
Triggers a transfer	Initiates a payment from the payer's account, never holding the funds.	PISP, or payment institution status in the UK
Takes deposits, grants credit	A bank in the full sense.	Banking licence: the heaviest of all

THE RULE THAT SAVES YOU

Qualify the model before you choose the country, and the country before you form the company. A wrongly qualified model costs more than a call: the whole file has to be redone. And if your model only issues e-money or executes payments, you do not need a bank: an EMI or PI meets the need for far less capital and cost.

123

financial licences in the AquaSands catalogue, by type and by country

€8,890

from, regulatory diagnosis and choice of licence: activities, flows, countries, recommended route

DECIDED ON THE CALL

How your exact flows qualify. Real products mix verbs: a wallet that also initiates payments, a marketplace that touches funds for a few hours. The mix decides the status, and it is case by case. Book the 45-minute call →

EMI OR PAYMENT INSTITUTION

02

Europe and the UK: two systems, one logic.

Both sides of the Channel separate e-money from payments, and both offer a lighter regime for small volumes. The capital is where the difference bites.

STATUS	CAPITAL (OUR CATALOGUE)	AQUASANDS, GOVERNMENT FEES INCLUDED
EMI · EU / EEA	€350,000 initial capital	from €87,390, then €42,890 per year
PI · EU / EEA	€20,000 / €50,000 / €125,000 depending on services	from €90,790, then €50,490 per year
Small EMI · EU	Threshold and capital per national transposition	from €42,590, then €16,990 per year
Small PI · EU	Threshold and guarantee per national transposition	from €59,290, then €16,990 per year
AEMI · UK, FCA	Adequate capital under the UK rules	from €111,701, then €39,990 per year
API · UK, FCA	Capital according to payment services	from €111,701, then €29,990 per year
Small EMI / PI · UK	Thresholds and conditions of the small regime	from €88,890, then €14,990 per year

PASSPORT AND SMALL REGIMES

An EU authorisation extends to other EEA countries through the European passport: from **€11,290** for one host country. It does **not** reach the UK. The small regimes are open only to models that stay under their thresholds: a plan that outgrows them on day one is not a small-regime plan.

CAPITAL IS NOT A FEE

The €350,000 of an EU EMI is never in anyone's price. It is **your company's own money**, from documented sources, and it stays there. Pigeons budget the file and forget the capital.

DECIDED ON THE CALL

EU or UK, full or small regime, and which EU home country fits your users and your team. That choice sets the capital, the timeline and the annual cost. Choose your route →

OPEN BANKING

03

Reading is not paying. The regulator knows it.

Open banking rests on two separate services, each with its own authorisation: reading a customer's accounts with their consent (AISP), and initiating a payment from their account (PISP).

AISP · EU

€59,290

from, then €18,490 per year

Account information only. Our catalogue pairs it with **professional indemnity insurance** or comparable cover, rather than capital.

PISP · EU

€90,790

from, then €42,890 per year

Payment initiation. Our catalogue shows **€50,000 of capital** plus insurance or equivalent cover under PSD2.

RAISP · UK

€59,290

from, then €9,990 per year

The FCA registration for account information, with professional indemnity insurance. To initiate payments in the UK, you need **payment institution** status.

How to choose, in three lines

- [ ] **An app that displays accounts and balances:** AISP, or RAISP in the UK.
- [ ] **An app that triggers payments:** PISP, or payment institution status in the UK, from €111,701, then €29,990 per year.
- [ ] **Both:** the combined AISP + PISP file in the EU, from €90,790, then €42,890 per year: cheaper than two separate files.

WHAT THE REGULATOR READS FIRST

Not your growth curve. **Security and consent management.** Who can see what, for how long, how consent is recorded and withdrawn, what happens when something is breached. A beautiful app with a thin security file is a refused file.

DECIDED ON THE CALL

The exact scope of your service, which decides the status, the capital or insurance, and the price; and whether your users sit in the EU, the UK or both. Frame your scope →

SINGAPORE, THE US AND CANADA

04

Outside Europe, count the layers.

Each market stacks its rules differently. In Singapore the volume sets the level. In the United States one registration is never the whole story. In Canada the registration is light, the compliance is not.

SINGAPORE · MAS

Two levels under the Payment Services Act: **Standard Payment Institution**, and **Major Payment Institution** for volumes above the standard thresholds.

Held by a Singapore company with a **resident director** and a company secretary. Formation from **€3,290**, in 1 to 5 days. The licence itself: on request.

UNITED STATES

FinCEN registration first: no federal capital, no registration fee, renewed every two years, by 31 December of the second calendar year.

Then, in most States, a **money transmitter licence** per State: its own surety bond, net worth and liquidity, renewed every year on NMLS, from 1 November to 31 December in most States.

CANADA · FINTRAC

MSB registration: no registration capital and no registration fee. Valid for **two years**, renewed before it expires.

A foreign company directing its services at Canada falls under **foreign MSB registration**. In both cases, the anti-money-laundering programme is the real work.

THE US TRAP

FinCEN is the door, not the house. The federal registration **does not replace State licences**; it comes before them. Serving the whole country means a multi-State programme: a first batch of priority States, then State by State, with **bonds and net worth that add up**.

Why these files are on request

In Singapore the scope of services sets both the regulator's requirements and the work on the file. In North America the cost follows the number of States, the bonds and the model. Each quote is firm before signature, government fees included; the security deposit, the bond and the capital remain the company's own.

DECIDED ON THE CALL

Your Singapore level and how the thresholds apply to your volumes; your first batch of US States; whether Canada needs a domestic or a foreign MSB. Map your markets →

BUILD OR BUY

05

Your own licence, or someone else's?

You do not always need your own authorisation on day one. You can sell under a licensed firm, distribute its product, or buy a firm that is already licensed. Each route trades control for speed and capital.

ROUTE	HOW IT WORKS	CAPITAL (OUR CATALOGUE)	AQUASANDS, FROM
White-label BaaS	You distribute a licensed provider's banking or payment product under your brand.	Reserve and minimums according to provider	€12,190, then €12,190 per year
Agent · EU	You provide payment services under a principal's licence.	No own capital; the principal is liable	€22,345, then €4,990 per year
E-money distributor · EU	You distribute an EMI's electronic money.	No own capital; the EMI is liable	€22,345, then €4,990 per year
Change of control · EU	You acquire a firm that already holds the licence.	Financing + the licence holder's own funds	€16,690 one-off, for the acquirer file
Your own EMI or PI	You hold the authorisation and answer to the regulator.	€350,000 (EMI); €20,000 to €125,000 (PI)	€87,390 (EMI), €90,790 (PI)

WHY BUY FIRST

Test the market before you lock capital, and launch while your own file is being built. The principal carries the regulatory liability.

WHY BUILD

Your margin, not a provider's pricing. No one else's risk appetite can switch you off. And a licence is an asset the business owns.

PIGEON VS WOLF

The pigeon rents a white label and builds his whole company on it, then discovers the provider can change terms or exit his sector. The wolf **rents to learn and builds to own**: he launches on someone else's licence with a dated plan to his own, and a contract that lets him leave.

DECIDED ON THE CALL

Which route fits your stage, your capital and your timeline, and when to switch. Which provider or principal to approach is part of it, and we never name one before we know your model. Weigh build vs buy →

THE DAY AFTER AUTHORISATION

06

The licence is the entry ticket. Compliance is the rent.

A full EU, UK or Singapore payments authorisation is not renewed on a fixed date: it stands until the authority withdraws it or it is surrendered. That is the good news. The rest is an operation that runs every day.

What a licensed institution carries, every year

- [ ] **Safeguarding.** Client funds stay separate from the institution's own, in a safeguarding bank, with reconciliations and written procedures.
- [ ] **People.** A compliance officer and a money-laundering reporting officer (MLRO), in-house or outsourced.
- [ ] **Reporting and supervision.** Capital maintained, recurring regulatory reports, supervision fees.
- [ ] **Operational resilience.** In the EU, DORA: ICT mapping, incidents, continuity, testing, critical providers.
- [ ] **Change management.** Adding a service or changing the model goes through an extension of permissions, from €24,990.

€20,990
from, safeguarding arrangements design, then €9,990 per year

€23,363
from, per year, outsourced compliance officer; the same for an outsourced MLRO

€29,990
from, DORA / ICT readiness, then €14,990 per year

THE BANK IS PART OF THE LICENCE

For a payment institution, the bank account is **a central part of the file**, not an afterthought: no safeguarding account, no operating model. We present the file to banks as an obligation of means, never of result.

DECIDED ON THE CALL

Your real year-one and year-two operating budget: what to staff in-house, what to outsource, which safeguarding set-up suits your flows, and the reporting calendar of your regulator. **Budget the day after →**

THE SEVEN TRAPS

07

Where pigeons get caught.

01 **Choosing the licence before qualifying the model.** Hold, move, read or lend: get the verb wrong and the whole file is redone.

02 **Aiming for a bank when an EMI would do.** A banking licence is the heaviest in financial services. If you do not take deposits or grant credit, you are paying for a status you do not use.

03 **Counting the capital as a fee.** It is never in the price. It is the company's own money, documented and kept, on top of the budget.

04 **Believing one registration covers a market.** FinCEN does not replace State licences. An EU passport does not reach the UK. A small regime stops at its threshold.

05 **Treating safeguarding as paperwork.** Client money mixed with the company's own is the fastest way from licensed to remediated.

06 **Missing the calendar.** State licences renew every year on NMLS, FinCEN and FINTRAC every two years. A licence not renewed expires; a licence held still carries capital, reporting and fees.

07 **Trusting a guarantee.** The authorisation belongs to the regulator. Anyone who promises it is selling you something other than a file.

THE PATTERN

Every trap comes from the same mistake: buying a licence as a product instead of designing an operation the regulator can trust. The authorisation is the result of the design, not its first step.

The renewal calendar, at a glance

LICENCE OR REGISTRATION	RENEWAL RHYTHM
EMI, PI, AISP, PISP · EU and UK; MAS licence · Singapore	No fixed renewal: stands until withdrawn or surrendered. Capital, reporting, supervision and fees carry on every year.
FinCEN registration · United States	Every two years, by 31 December of the second calendar year.
Money transmitter licence · each US State	Every year on NMLS, from 1 November to 31 December in most States; if not renewed, it expires.
MSB registration · Canada, FINTRAC	Valid two years; renewed before it expires.

YOUR SCORECARD

08

Ready to file, or about to file twice?

Tick honestly. This is for you, not for us.

I can say in one sentence whether my product holds, moves, reads or lends money.	Yes ☐	No ☐
I know whether I need an EMI, a PI, an AISP/PISP, or an agent route.	Yes ☐	No ☐
I know where my users are: EU, UK, Singapore, the US, Canada.	Yes ☐	No ☐
I can show the initial capital, from documented sources, on top of the budget.	Yes ☐	No ☐
I know how client funds will be safeguarded, and with which kind of bank.	Yes ☐	No ☐
I have, or can appoint, a compliance officer and an MLRO.	Yes ☐	No ☐
I have decided whether to build my own licence or start on someone else's.	Yes ☐	No ☐
I have a year-one and year-two budget: file, annual costs, staff, reporting, renewals.	Yes ☐	No ☐

8 YES

You are ready to build the file. A call gets you a firm quote and a named team.

5 TO 7 YES

You are close. The gaps are usually qualification and safeguarding: 45 minutes closes them.

4 OR FEWER

Do not file anything yet. Book the call first; it may save you a rebuilt file.

BRING THESE TO YOUR CALL

Write down every "No" above. They are the agenda of your 45 minutes, and the answers you leave with.

WHAT THIS PLAYBOOK LEAVES OUT ON PURPOSE

The last 20% is yours alone. That is where we come in.

You now know the logic. What a document cannot do is apply it to your flows, your users, your shareholders and your capital. These are the decisions we make with you:

- How your model qualifies: EMI, payment institution, AISP, PISP, or a lighter route.
- Your home regulator and your markets: EU, UK, Singapore, the US States, Canada.
- Build or buy: your own licence, an agent or distributor route, or a white label first.
- Your safeguarding set-up, your compliance team and your bank.
- Your real year-one and year-two budget, as a firm quote with government fees included.

BOOK YOUR 45-MINUTE CALL

aquasands.net/request

At the end, we tell you what we would do in your place, including building nothing at all. The answer is often no, and we would rather say so before billing anything.

CALL · WHATSAPP · TELEGRAM
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HOURS
Mon–Sat, 9am–1am CET
French and English

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