



INTERNATIONAL MINT  
INDUSTRY ASSOCIATION

**Access (and Deposit) for Citizens and Merchants –**  
**Impact on Cash Acceptance and Usage**  
*& vice versa*

Martina Horakova, Managing Director, IMIA

ESTA Conference, Prague, 3 June 2024



INTERNATIONAL MINT  
INDUSTRY ASSOCIATION

## About IMIA :

*For inclusive, democratic, resilient and sustainable cash and coin **access and acceptance.***

- Established in **July 2022**
- **7 Full** (Mint) **Members + 7 Associated** (Industry) **Members**
- **Primarily** direct engagement with **central banks & governments (treasuries)** and **consumer & merchant** associations (and other cash industry associations)
- Focus: **Legal tender** for euro cash (relatedly to digital euro) + European national cash legislations

## Legal Tender(s) - *what's the purpose/usage goal?*

### Euro Cash:

‘to **clarify and enhance legal certainty** of the implication of the legal tender status of cash as set out in the **2010 Recommendation**’

- **sufficient** and effective access
- monitoring **non-acceptance levels** (no public authorities)
- **merchant access conditions not addressed**

### Digital Euro:

‘necessary to supplement cash and adapt the official forms of the currency to technological developments, so that the **euro can be used as a single currency**, in a **uniform** and effective manner **across the euro area**’

- **easy** and **widely-available**
- **mandatory acceptance** (all use cases)
- **the level of charges or fees to be paid by merchants subject to limits**

## Legal Tender(s) - *what's the purpose?*

### Euro Cash (ala Digital Euro) :

'is necessary to *supplement digital euro* and adapt the official forms of the currency to:

- **cyber-resilient personal data safety and privacy,**
- **universal inclusivity,**
- **crisis-resilience with respect to e.g. natural disasters and electronic hacking,**
- **unlimited store of value function, and**
- **tangibility and physicality giving citizens self-reliant autonomy**

so that the euro can be used as a single currency, in a *uniform* and effective manner *across the euro area*'



## Legal Tender for Euro Cash – **USAGE**

### Digital Euro (EC proposal):

“Member States shall ensure that adequate measures are in place **to raise awareness among the public** about the availability and features of the digital euro and possibilities of access to the digital euro.”

### Euro Cash (IMIA Amendments):

“Authorities should raise awareness among citizens about **their right to pay cash** and inform them about channels where they can register their complaints, such as the central bank or the consumer ombudsman. Member State authorities should use tools like mystery shopping to monitor cash acceptance.”



## Legal Tender for Euro Cash – *Access/Acceptance adequate to Demand*

### Digital Euro (Banque de France):

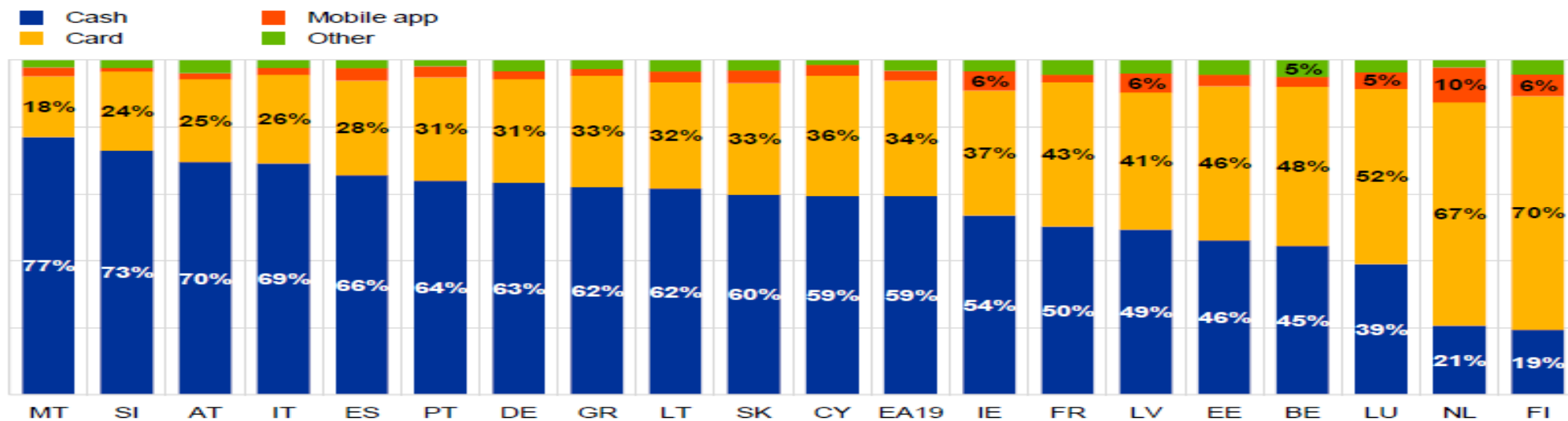
“While **one in two French people paid** for at **least one online purchase per month** in 2023, the digital Euro will offer more choice in the digital age. It will be **free for individuals**, will preserve their anonymity, and will allow them to **pay for everything.**”

### Euro Cash (EP - Berger report):

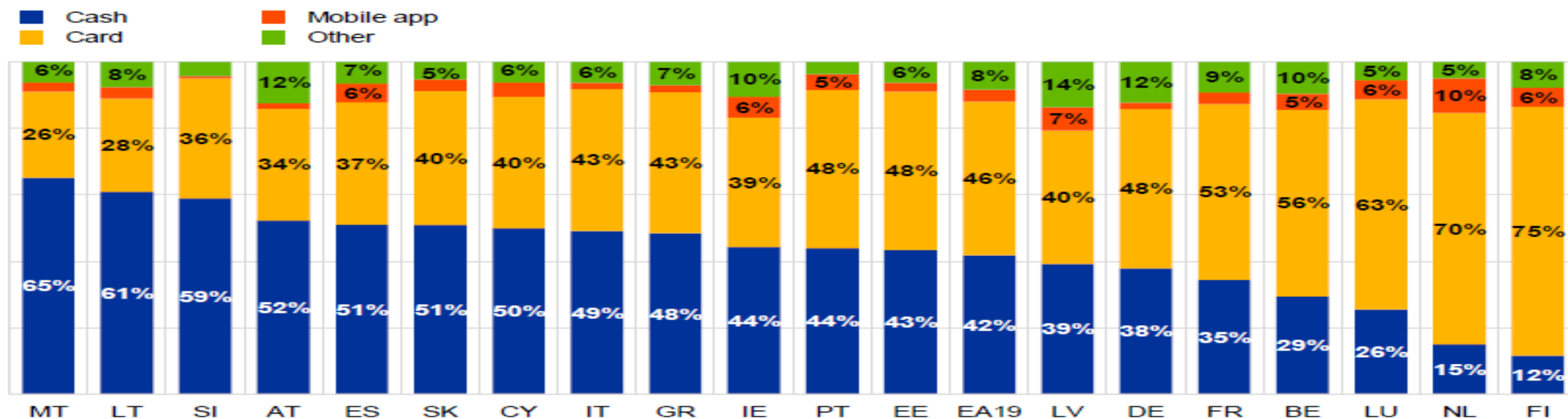
“Member States shall ensure sufficient and effective access to cash throughout their territory [...] on the basis of the common indicators adopted by the Commission, **weighted according to individual national indicators connected with national cash demand.**”

# USAGE/PAYMENT HABIT - Finland

## Number of transactions



## Value of transactions





## USAGE/PAYMENT HABIT - Finland

- The **highest shares of online payments by value** were reported in Slovenia (40%), **Finland (37%)**, Belgium (36%) and Austria (35%).
- The share of **mobile payments (by number of transactions)** was **highest** in the Netherlands (10%), and exceeded **5% in Finland**, Ireland, Latvia and Luxembourg.
- Germany and **Finland** reported the **highest percentage** with access to a **payment card** (99% each), while Portugal (79%) reported the lowest.
- **Card payments were the most frequently used method** at the POS in 2022 in four euro area countries: **Finland (70%)**, the Netherlands (67%), Luxembourg (52%) and Belgium (48%).





## USAGE/PAYMENT HABIT - Finland

### Access satisfaction:

- **78% of private individuals** said cash *withdrawals and deposit* services **neither sufficient nor affordable**
- **65% of businesses** said cash *withdrawals services* **neither sufficient nor affordable** and **50% businesses** cash *deposit* services **neither sufficient nor affordable**

### Acceptance satisfaction:

- **78% of private individuals dissatisfied**
- **47% of businesses dissatisfied**

*Publications of the Ministry of Finance (2024): Evaluation of banking services and credit institutions legislation - Assessment report on the timeliness of regulation and the need for change*



## Brussels/Belgium - Consumer and merchant access survey

- 96% private individuals and 97% merchants want cash access within ten minutes walking distance.  
(That is an average distance of 667m while the federal ‘gentleman’ agreement sets a maximum distance of two kilometers.)
- 30% of machines are not accessible on weekends or evenings
- 50% of ATMs do not offer a “deposit” function (especially in the center of Brussels)
- 55% of private individuals and 70% of merchants are “dissatisfied” with the current number of access to cash locations



INTERNATIONAL MINT  
INDUSTRY ASSOCIATION

## Legal Tender for Euro Cash – Merchants Access and (Deposit) & Change Money

*Acceptance exemption (EC proposal):*

“In **exceptional cases**, if the enterprise has **no change available at the moment** where the cash is tendered in payment, or if there would be **not enough change available as a result of that payment** for an enterprise to **carry out its normal daily business transactions.**”

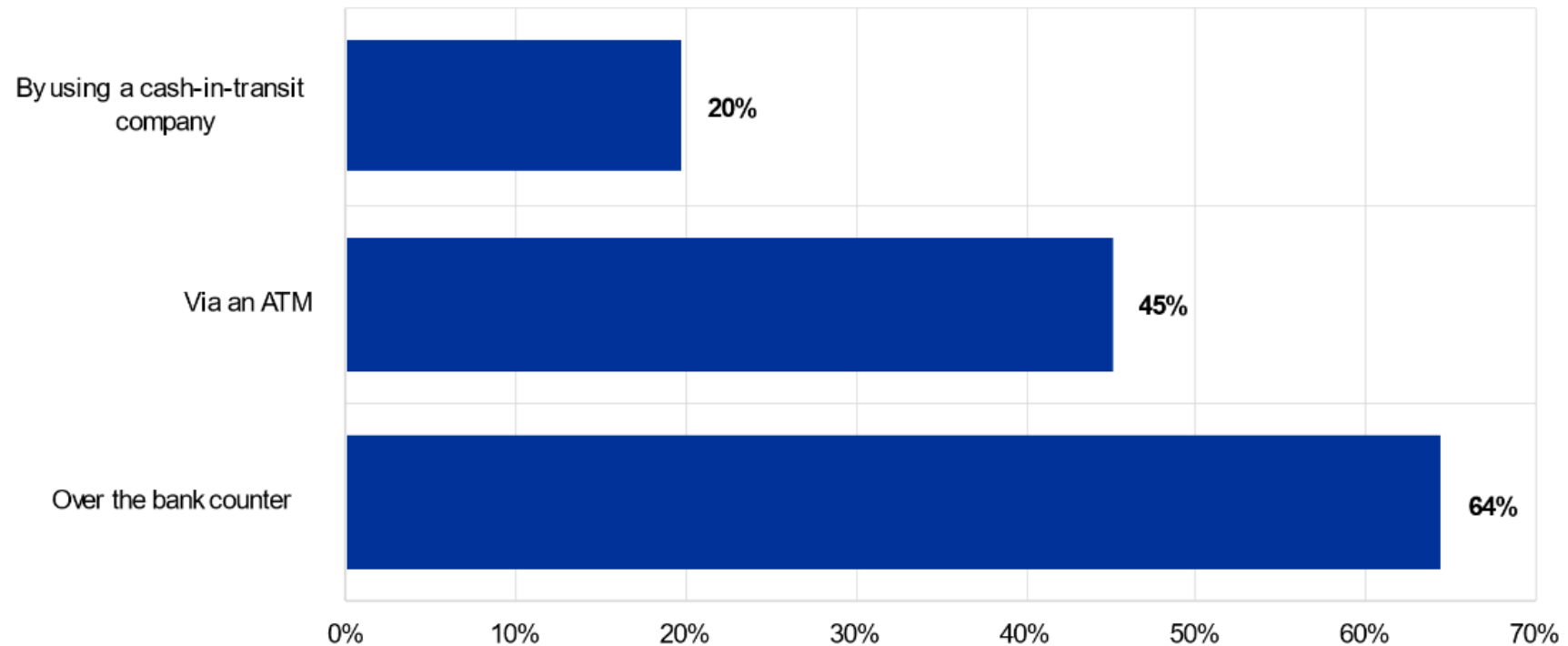


## Legal Tender for Euro Cash – Change Money

### How companies withdraw cash

---

#### a) Euro area

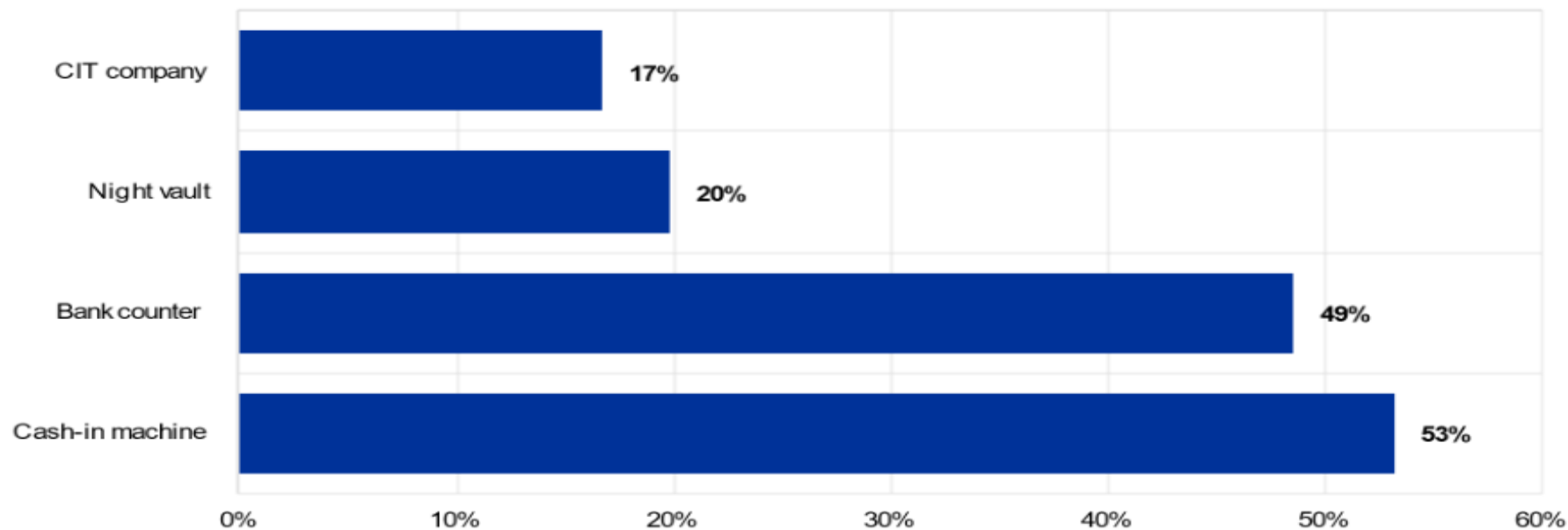


## Legal Tender for Euro Cash – Change Money

Over eight out of ten (85%) companies deposit cash.

### Chart 10 Cash deposits

a) How companies deposit cash, euro area



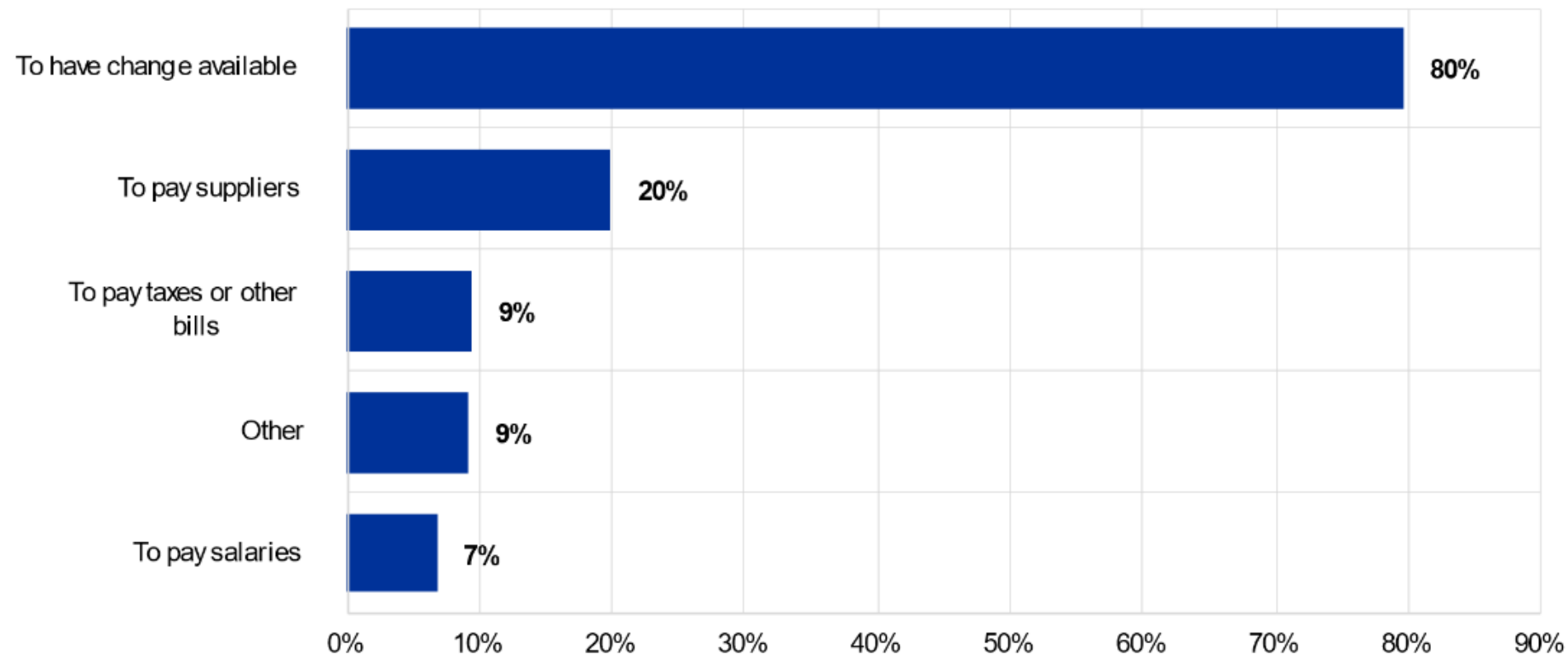


## Legal Tender for Euro Cash – Change Money

### Why companies withdraw cash

---

#### a) Euro area





## Legal Tender for Euro Cash – Merchants Access and (Deposit) & Change Money

### Merchants worsening conditions (acceptance obstacles):

- Deposit limits
- Bank branch (or cash services) closures
- Reduced bank branch office hours
- Banknote and coin deposit ATMs in separate locations
- Increased deposit fees
- Increased change money access fees
- ATMs in insecure locations
- ATMs out-of-order

### EuroCommerce position:

- in case of mandatory acceptance of cash, the resulting costs should be **legally capped at a fair & competitive** rate
- governments, central & commercial banks should ensure an adequate level of **cash infrastructure**, both for **withdrawal and depositing cash by both consumers as well as by retailers**



## Legal Tender for Euro Cash – Change Money

### Access indicators (IMIA amendments):

- (a) the access to ATMs including the geographical distance by **foot**, car and public transport and the number of ATMs in relation to population density;
- (b) the **availability of ATMs for cash deposits**
- (c) the availability of banknotes of **different values denominations** at ATMs;
- (d) the availability of **cash services over the counter** including opening hours of bank branches;
- (e) the **fees charged for cash services at ATMs and over the counter**





## Legal Tender for Euro Cash – Change Money

Access branches/ATMs (EP-Berger report + IMIA amendments):

“Providers who intend to **close a bank branch or an ATM** shall perform **before any decision is taken** a detailed **impact assessment** [...] to ensure that **easy, convenient, and crisis-resilient access** to cash remains guaranteed.

[...] **national authorities should assess** the assessment, in **consultation with civic, consumer and merchant** associations.

**Where** easy, convenient and crisis-resilient **access to cash** could **not** be **guaranteed** as per common minimum standard criteria, the **provider** responsible should be **prohibited from the ATM or bank branch closure**, until the provider responsible takes measures to guarantee the required access to cash.”