

Policy Requirements regarding the Single Currency Package – Updated version October 2025

The International Security Ligue (following “Ligue”) welcomes the legislators’ intention to establish a legal framework for central bank currencies that seeks to create a **level playing field for physical (cash) and digital central bank money** in terms of availability, accessibility and acceptance.

However, recent publications by the ECB ([ECB Occasional Paper No 360](#)) raise concerns about this intention, as the ECB is considering scenarios to keep the amount of public money in circulation constant after the digital euro is issued, with the effect of jeopardising the availability of cash and contributing to the trend towards cash substitution - the opposite of what has been stated so far.

The Ligue believes that the current legislative package already contains **significant differences for the two forms of public money** that may condition the coherence between the two – with the result of **further weakening the cash infrastructure and allowing private actors to further prevent access and availability of cash for consumers**. This is particularly the case **with regard to a) the acceptance and the distribution system - with implied subsidies for the digital euro**, which could lead to the alleged complementarity of the digital euro with the physical euro being replaced and its future viability being called into question, **as well as b) with regard to a preventive strategy for the decline of cash** that goes beyond monitoring by the national authorities and leaves no room for reversing the trend when most needed.

Existing **market practices encourage consumers to use certain payment methods without offering alternatives**, which might lead to a statistical change in consumer behavior. For example, consumers may be forced to use Visa or Mastercard at point-of-sale (POS) terminals or ATMs by blocking the use of girocards for cash withdrawals or payments. Similarly, Mastercard may try to acquire new customers by promising fee- and interest-free reimbursements within seven weeks, which is true, except for cash withdrawals. Such market practices need to be carefully monitored, systematically recorded, and sanctioned.

Despite being one of the most important and widely supported means of payment, we believe that institutional support for cash still needs to be strengthened, regardless of any form of digital money foreseen in the future. In our view, the **mandatory acceptance of cash must be confirmed and regularly monitored**. A **minimum sustainable payment infrastructure must be ensured** for both digital and physical payments **to support sovereignty, resilience, and security**. Citizens should not be forced by policy or by a lack of policy coherence to switch to the digital payment methods, exposing them to the undesired consequences such as data security issues, fraud, financial and social exclusion, additional costs for digital services imposed by their providers, loss of independence, and vulnerability in times of crisis.

As with the digital euro, it is **necessary to legally preserve such a minimum cash distribution network to ensure the vitality of the cash cycle and its ability to fulfill its functions of sovereignty, security,**

and resilience for the entire Eurosystem. This will **help mitigate negative impacts** on citizens, the real economy, and the financial system in the event of external threats, such as regular IT and electricity outages, or other scenarios resulting from growing geopolitical and natural risks.

Banks are the critical payment infrastructure providers. We thus agree with the ECB's statement in one of the latest ECON Committee meetings that it should be ensured "that Member States hold the banking sector [with Central banks to play an important role, too] responsible for providing essential cash services to both private and corporate customers, ensuring good access to facilities for withdrawing and depositing euro cash across the euro area" ([Speech Piero Cippolone ECON 9 April 2025](#)).

While we acknowledge the intention of the legislators and the ECB to introduce a digital central bank currency to support Europe's strategic autonomy and monetary sovereignty and to protect privacy, financial and social well-being of citizens, we believe that the **EU legislators should as well ensure that the digital euro and legal tender legislations** are designed in such a way that they **do not allow or even discourage the use of cash, weaken its legal tender status and the critical cash infrastructure, and thus achieve the opposite of the intended goals.**

In order for cash to fulfill its stabilizing function during a crisis and protect the rights, security, and welfare of citizens, as well as maintain economic and financial stability and sovereignty, there must be **coherence in the legal frameworks for both digital central bank currency and cash.** This ensures that the cash cycle is supported and preserved in the same way as the digital one:

- the **legal tender status must be coherent** for both the digital euro and the physical euro;
- **mandatory acceptance for cash** needs to be assured and an **effective monitoring and enforcement regime** established;
- the **distribution network** must be safeguarded with a clear mandate for Central Banks and an anchor for requiring and monitoring a **minimum distribution network to allow for sufficient availability and accessibility**, and to **guarantee the real effectiveness of the objectives related to the functions and benefits of cash** in line with the Eurosystem's cash strategy;
- the **fundamental right of EU citizens to choose** their means of payment must be **properly safeguarded** by guaranteeing the mandatory acceptance of cash;
- **social groups** that for various reasons are unable or unwilling to cope with digital payment methods (such as the elderly, the disabled, those with limited digital literacy or security concerns, or those who are financially not well equipped) **may not be excluded** from payment methods and thus endangered by **increasing their financial and social vulnerability**;
- **public policy may not enforce a publicly undesirable trend that increases the vulnerability of the entire EU payment system** and, as a consequence, hampers the resilience, security, and sovereignty of the society, the economy and the financial system by failing to maintain cash as a critical part of the critical payment infrastructure that is an inevitable pillar required to withstand crisis and threats.

Therefore, we **call for a more cautious and holistic approach in the forthcoming revisions of the draft legislations** on legal tender euro cash and the digital euro (the Single Currency Package) as well as to the design of the digital euro.

A **holistic approach is needed that further considers the changes to the Payment Services Package (see our separate position paper)**, as the current version published by the Council and the general ban on surcharges as introduced by the Parliament has **additional severe negative impacts** on cash accessibility and availability with the consequence of increasing opportunity costs for citizens and businesses to access and deposit cash, when networks are withdrawn.

Therefore, we call for a **thorough assessment of the impact of these legislative procedures on the cash cycle and the cash industry**.

The **International Security Ligue** is a global association and the highest-ranking business association in the cash industry. It **represents the largest companies worldwide, and** many of its members provide cash transportation, distribution, and cash management services **across the EU**.

The **Ligue welcomes an open dialogue with EU legislators** about the consequences of their planned legal framework for the Single Currency Package and the Payment Service Package. Such a dialogue would **help shape a framework that serves as a strong pillar for national security, sovereignty, resilience, trust, inclusion, and freedom of choice**.