



# The Challenges Consumers Face in Accessing Cash

**Anne-Sophie PARENT**

Former Secretary General AGE Platform Europe

Co-chair of the ERPB WG on Cash

[ansoparent@gmail.com](mailto:ansoparent@gmail.com)

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# A broad range of consumers need cash

- Children and older persons
- Young people with limited digital skills. In FR, 20% of people aged 15-29 do not feel confident using digital devices except for connecting with friends/social media ([LeMonde, 28/01/2022](#))
- Those with no/low digital skills: in the EU 27, 40% of people aged 16-74 do not have the necessary overall digital skills to use digital financial services, and this figure has not changed since 2017 ([Digital Economy and Society Index \(DESI\) 2020 | Shaping Europe's digital future \(europa.eu\)](#))
- Those who do not trust digital payments means for fear of scams/fraud or for privacy issues
- The unbanked: in the EU there are still about 30 million adults without a bank account ([EC Retail Payments Strategy](#))
- Tourists and other groups who - for various reasons - are affected by declining cash supply where they live or travel cross-border for professional or personal reasons.

This means that a significant number of consumers cannot function without cash in today highly digital retail payments ecosystem.

# Specific issues related to access to cash 1/2

Geographical coverage of ATMs and bank branches has decreased sharply in recent years, not only due to the covid crisis.

- Consumers report increasing challenges to access cash within reasonable distances in particular in suburban areas, rural areas, touristic areas affected by seasonality, and other areas where ATMs are removed or no longer adequately serviced.
- The new criteria used to assess the availability and capacity of the ATM network do not take into consideration the challenges faced by some groups and the ageing of the population in some areas.
- Having one ATM within 15 minutes driving distance is often considered too far by consumers, in particular when there is no or few public transport or there is only one ATM available to service a large geographical area creating long queues on weekends or holiday peak season. This can be also the case when only one ATM is maintained in the high street.

# Specific issues related to access to cash 2/2

- Alternative ways to access cash such as cashback (CB) and cash-in-shop (CIS) are welcome and used to withdraw limited amounts of cash. Small retailers fear that CB and CIS will become very challenging for them if the levels of cash they have to provide increase in the future. For higher cash needs, these alternatives cannot replace the traditional ATMs and bank branches.
- Post offices play a key role in providing cash services through their wide network that reach out to remote areas. However, small local post offices are reducing their business hours and are facing challenges to maintain their presence in small villages and remote areas due to the unsustainable business model.
- Many customers with disabilities face even greater obstacles to access cash caused by the lack of accessible solutions in their nearby environment. Yet the European Accessibility Act – which covers ATMs and banking services – shall be transposed by 28 June 2022 and applied by 28 June 2025 in all EU member states.

# Specific issues related to acceptance of cash

- Although in most euro area countries cash is still widely accepted as a mean of payment, the promotion of digital means was boosted at the beginning of the covid crisis by unfounded fears that banknotes and coins were spreading the virus. More retailers are now only accepting digital payments.
- Even some public authorities accept only digital payments, excluding a significant group of non-digital customers. These consumers are facing huge difficulties when no alternative option is available for them to pay with bank notes and coins. Yet the EUCJ [Judgment in Joined Cases C-422/19 and C-423/19 Johannes Dietrich and Norbert Häring v Hessischer Rundfun](#) (26/01/2021). According to this Judgement: [“A euro area Member State can oblige its administration to accept payments in cash, but can also limit that payment option on public interest grounds”](#).
- Fully in line with the EAA, & 77 of this Judgment states that when the lawful alternative means of payment may not be readily accessible to everyone liable to pay it, this would entail providing for those without access to such means of payment to be able to pay in cash.\*

# What can be done to improve access to all

- Consumers are concerned that in many countries, it is not deemed necessary to legislate to impose a minimum coverage of ATM and bank branches, as sufficient coverage is driven by market forces themselves (Eurosystem).
- They are worried that the broad national indicators used to monitor coverage do not reflect the challenges faced by some consumers/local authorities/retailers who are complaining in the media about banks' decisions to close branches and/or remove ATMs without a proper assessment of the negative impact such decisions will have on their daily life and the local economy. For local shops this may result in losing their clients who will shop near the ATM in the nearby city rather than in their village.
- To improve consumers' experience across the EU including for vulnerable consumers, common indicators could be developed to measure coverage in comparable ways across the EU.
- In order to monitor closely how access to cash is evolving in the future, the ECB could run regular surveys to measure consumers/retailers satisfaction with cash services, in particular in rural/remote areas and with regard to accessibility for persons with disabilities.

# What is important for consumers

- For consumers, it is crucial that the development of the cash infrastructure in the future is not left alone to the market forces since consumers who need cash to function are in a weak position.
- For cash to remain an inclusive, efficient and sustainable means of payment for consumers alongside digital retail payments means, measures are needed to ensure that a minimum infrastructure is deployed and adequately maintained.
- The only way to achieve that may be through the legal imposition of minimum coverage of easily accessible ATM/cashpoints and bank branches and a strong commitment to maintain the necessary cash infrastructure for cash services to remain accessible and affordable for all.



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