DIGITAL EURO

NEXT STEPS

BEUC The European Consumer Organisation

The Consumer Voice in Europe

Why it matters to consumers

As society becomes increasingly digital, consumers need a digital payment method that works for everyone. As a public way to pay (like cash), the digital euro can be built in the interest of consumers. Getting its design right is essential for the success of the project, so that it is attractive and used by consumers.

This paper summarises BEUC's recommendations for trilogue negotiations on the establishment of the digital euro Regulation. For more information, see our survey report on what consumers expect from the digital euro, our position paper, and consumer checklist.

Check our position paper

TOPICS	BEUC'S RECOMMENDATIONS
FREE BASIC AND MANDATORY DIGITAL EURO PAYMENT SERVICES	Basic services offered free of charge must match consumer expectations. Offering a payment card and a mobile application, a dispute mechanism including commercial disputes, switching to other providers and inclusiveness support in person by public entities and (de)funding into cash should be added to the list of basic services. To avoid higher costs for payment accounts, Parliament's non circumvention clause should be supported, so basic services stay free without hidden fees, unfair bundling or reduced quality.
HIGH PRIVACY FOR ONLINE AND OFFLINE PAYMENTS	The digital euro should offer privacy by design and by default and clearly comply with GDPR as foreseen by Parliament. BEUC supports Parliament and Council's additions to apply state-of-the-art technology and their explicit prohibitions on the Eurosystem being able to identify individual users. For offline payments, BEUC supports having cash-like privacy, including Parliament's prohibition on storing transaction data on the user's device applying by default.
LEGAL TENDER AND MANDATORY ACCEPTANCE OF DIGITAL EUROS	BEUC welcomes the legal tender status and mandatory acceptance of the digital euro, so it can be widely used. BEUC supports Parliament's approach to exceptions, limiting them to cases where the enterprise does not accept any other digital means of payment. BEUC also welcomes both Council and Parliament's addition allowing consumers to choose between paying online or offline for proximity payments (e.g. payments in shops or person-to-person).

TOPICS	BEUC POSITION
PUBLIC ENTITIES AND INCLUSION SUPPORT	BEUC supports binding technical standards on how Payment Service Providers (PSPs) apply anti-money laundering rules to vulnerable groups while ensuring their financial inclusion, as suggested by Parliament. BEUC welcomes Parliament and Council's requirement for on-site and in-person inclusion support. Yet, the text should be further improved to ensure wide geographical availability and access for all consumers.
PREVENTION, PROTECTION AND RESILIENCE	BEUC supports strengthening protection against fraud by making the ECB's fraud detection and prevention mechanism and verification of payee mandatory. BEUC supports Council and Parliament's additions on resilience and preparedness to ensure that consumers have access to essential services in crisis situations.
COLLECTIVE REDRESS	To ensure that consumers can collectively defend their interests on the digital euro, similarly to other payment methods, the legislative framework must be added in the annex of the Representative Actions Directive as foreseen by Commission and Parliament.
ACCESSIBILITY REQUIREMENTS AND INTEROPERABILITY WITH THE EUROPEAN DIGITAL IDENTITY (EUDI) WALLET	BEUC supports the Commission proposal to make the ECB's digital euro app mandatory for PSPs to offer, since the ECB app will meet the highest available accessibility standards, going beyond the EU Accessibility Act applying to PSPs' own apps. Consumers should be offered a wide choice of authentication methods and should be able to integrate the digital euro into the European Digital Identity Wallet, as suggested by Parliament.
HOLDING LIMIT	BEUC supports the Commission's proposal in which the ECB develops and sets the holding limits given its independent role in maintaining financial stability. BEUC supports the obligation to ensure usability and accessibility when setting the limits, so the digital euro is attractive and practical for consumers to use, as suggested by Parliament.
ACCESS FOR CONSUMERS IN NON-EUROZONE MEMBER STATES AND THIRD COUNTRIES	Consumers living in a non-Eurozone Member State should be able to use the digital euro when paying in euros (e.g. when travelling or shopping online). In this regard, BEUC supports Parliament's lower threshold for when banks in non-euro Member States must offer digital euro services on request and the requirement for the ECB to explain the reasons to refuse to sign an agreement allowing access in a given Member State.

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