Position Paper

24 January 2024

For retailers 'cash' is not always 'king'

Key messages

1. While retailers are in general expected to keep accepting cash, general **usage of cash by customers to pay retailers is declining**.

2. Current market developments, such as inflation, safety, increased bank fees and AML measures, are **increasing the costs for retailer of accepting cash** as a means of payment even further.

3. While cash currently is in particular in Northern Europe one of the more expensive means of payment for a merchant, current trends are increasing costs to a level in which the acceptance of cash will become economically unviable for retailers. For consumers in most countries, cash withdrawals are free of charge, incorrectly giving consumers the impression that there are no costs associated with cash.

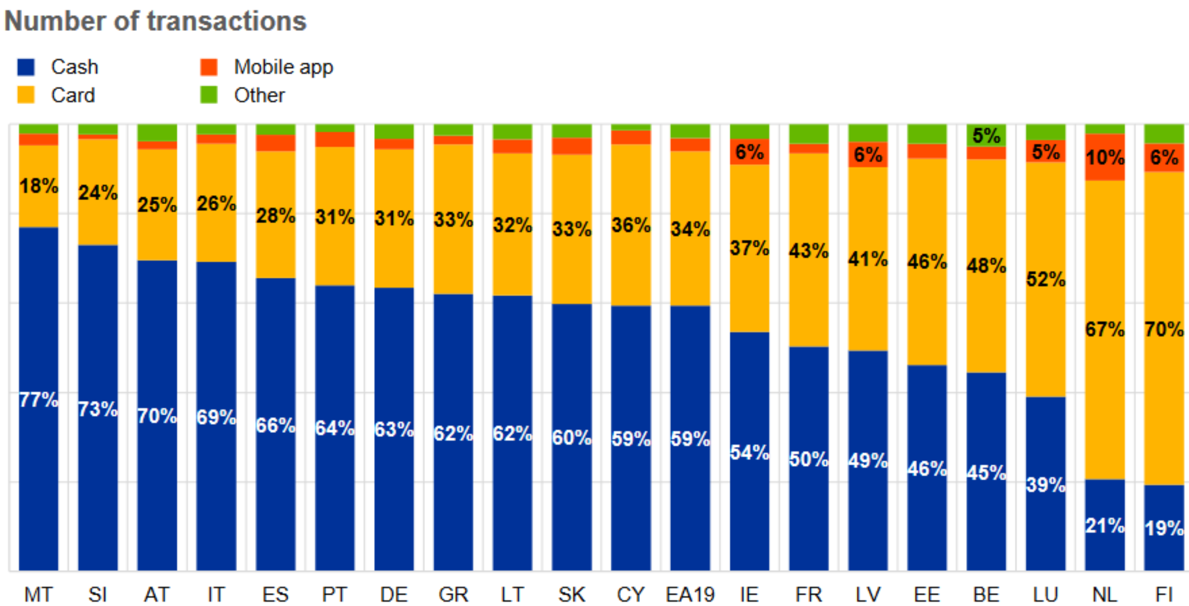
4. To counter these developments, EuroCommerce strongly recommends the following actions:

    - ensure legal conditions in which **retailers can decide to not accept cash**, if economically not viable, practically impossible in unmanned use cases or not safe.
    - in case of mandatory acceptance of cash, the **resulting costs should be legally capped** at a fair rate & competitive in comparison with other efficient means of payment. Also, the burden caused by regulation should be minimized and **appropriate acceptance exemptions**, e.g. for unmanned use-cases, should be foreseen.
    - 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.
    - **charging fees to merchants who offer cash-back should not be allowed**.
    - regulators should consider taking appropriate measures to enable and ensure **seamless cross-border Cash-In-Transit** (CIT) services in the Single Market.

We will continue to serve our customers who want to pay in cash, provided it's affordable, practical, sustainable and safe to do so.

1. Background

The payment market in the European Union is fragmented. The percentage of cash payments, based on turnover, ranges from 10% in Finland to 54% in Bulgaria. Based on the number of transactions, consumers in Finland use cash for 19% of their transactions and the Maltese consumers for 77% of their transactions. While the situation is very diverse across Member States, cash remains an important means of payment in the European Union.



In most Member States, however, the use of cash as a means of payment is decreasing. This trend was further accelerated by the COVID-19 pandemic, which led to a boost for digital payments. The annual payments statistics of the European Central Bank show that in 2021 the number of non-cash payments in the Euro area increased by 12.5% (compared to 2020). Among other reasons, this has led the European Central Bank to start the investigation on 'the digital Euro" in 2021.

This situation presents the commerce sector, which provides access to everyday commodities and goods to consumers, with an increasingly difficult choice. On the one hand there are important reasons for accepting cash payments to meet customers' expectations in convenience and maximising inclusion of the customer base (i.e., those who do not have access to digital payments by choice or by force). At the same time, the shrinking number of cash transactions causes a sharp increase in unit costs for cash handling. In addition, retailers aim to reduce the presence of cash on their premises to improve security and safety for their staff and customers and working with authorities and banks to prevent money laundering.

In this paper we identify policy actions that can support retailers in maintaining an inclusive shopping environment, enabling customers to use cash for their shopping, while avoiding excessively high costs and protecting retailers from competitively disadvantageous actions.

For a central bank, cash is a means of conducting monetary policy. For a consumer who wants to be autonomous and have no digital identity, cash is a means to remain almost totally anonymous. For retailers, there are mainly disadvantages to accepting cash: **cash is risky (robbery), dangerous (attacks using explosives), susceptible to fraud (theft, counterfeit money), is increasingly linked to money laundering which causes administrative burden and is laborious/costly to handle.**

It is **risky** because (the perception of) the presence of cash is already sufficient to attract the attention of robbers. Investments in robbery prevention are expensive. Employees also no longer want to sit at 'cash registers' and unions and employee representatives are concerned about the safety of the workplace, for which employers are liable.

Having cash around can be **dangerous** because criminals with explosives are increasingly blowing up outside walls where ATMs are present or instore, and the insurance does not always cover all the damage.

Cash is prone to **fraud** because a lot of cash is accumulated in cash drawers that are accessible to people. It demands tight processes and controls to keep this chain closed. There is also the risk of counterfeit money being accepted.

Cash is also linked to **money laundering practices** due to requirements set by (central) banks and governments. Retailers that generate a more than average turnover in cash are treated as suspect and companies that more than often accept denominations of €200 are also increasingly suspect. There are countries where this leads to extra research costs which are being charged monthly and extra costs if denominations of €200 are deposited.

The 28 June 2023 Commission proposal for the regulation of euro banknotes and coins[1] does not recognise **safety aspects** related to cash handling by merchants for store staff and consumers.

Furthermore, the handling of cash is **laborious/costly** because of the risks and handling costs involved. Where turnover paid with debit cards immediately enters the administration, cash must first be counted with four eyes, placed in seal bags or safes, and transported. That is not a very safe and sustainable solution in the long term.

See also the Annex showing **acceptance by country** based on EuroCommerce member data.

2. Our issues

a. Cash handling costs

Accepting cash payments affects a retailer's business operation in several ways. It is about meeting customers' expectations regarding different means of payment, but also taking the necessary precautions to ensure a safe and secure store environment for customers and staff alike. Furthermore, the retailer needs to consider the high costs related to the handling of cash and mitigating the risks that are linked to the use of cash. A recent study in the Netherlands[2], where cash accounts for 24% of all transactions and 16% of the revenue in shops, hospitality and gas stations, shows that in total the cost of all payments to entrepreneurs is €1,35 billion of which almost half, €603 million is related to cash. A debit card transaction is costing an entrepreneur (all-in) € 0,17, while a cash payment €0,48. And still at that tariff banks say they lose €0,20 per cash transaction in 2021.

Cash is handled in different stages. Following payment at the point of sale, cash is picked up and transported to a bank or cash counting station. This service is usually undertaken by professional money transport services. Small retailers put cash in a seal bag and deposit the seal bag at a bank outlet. Retailers need a steady supply of cash to operate their registers. Large retailers draw their cash supplies from professional cash centres, which act as intermediaries between banks and retailers. SME's often draw their cash directly from their house bank.

These cash handling services represent a (semi-)fixed cost because of the large investments in trucks, security, withdrawal machines and money counting stations. The cost of having cash picked up from a retail outlet and transported to a bank or other secure location is being paid by the retailer, usually irrespective of the actual amount that is being transported. This means that as the share of cash in total payments decreases, the unit prices related to cash handling increase. In other words: the lower the share of cash payments, the more expensive it gets for the retailer to offer cash as a means of payment. To control operating costs and to mitigate safety risks, a growing number of retailers are applying "cards only" or "no cash" policies, although still in more than 90-95% of all stores cash is being accepted today, even in countries where cash usage is very low.

---

[1] https://economy-finance.ec.europa.eu/euro/use-euro/euro-legal-tender_en

[2] https://www.betaalvereniging.nl/en/actueel/nieuws/costs-revenues-dutch-payment-services-2021/

b. Access to cash

As a precondition for the retail sector to continue accepting cash as a means of payment, it is essential that the necessary cash infrastructure is maintained at affordable cost levels that can compete with other payment methods. An important aspect is the reliable access to coins, which retailers need to give out as change to customers in case of cash payments. In some Member States, such as Belgium, we recently witnessed a sustained shortage of 5, 10 and 20 cent coins. In addition to the inconvenience for customers, such supply issues on a regional or even national scale leads to significant cost increases for merchants, as they need to use service providers outside of their operational territory, often on short notice. Such unplanned expenses make cash competitively disadvantaged compared to electronic means of payments.

Next to making cash available, sufficient and functioning infrastructure must remain accessible to retailers to dispose of cash. This affects SME retailers particularly, who don't have the scale for or can't afford CIT services.

c. Cashback

One of the central tasks of the banking sector has been to provide consumers with access to cash. However, this situation is currently changing. To optimise their costs, commercial banks are increasingly closing branches and reducing the number of ATMs they operate. As a result, cash has become less accessible for consumers and especially SME-merchants.

While retailers have little interest in taking over the role of the banks to ensure access to cash to the public, some retailers have responded by offering so-called "cashback" services. This service allows customers to withdraw cash as part of the payment process at the register. Stores offering cashback services have become a critical part of the cash infrastructure in several countries, especially in rural areas where an increasing number of ATMs have been removed by banks.

In some countries i.e., in Germany, the banks charge retailers a %-based fee for every cashback transaction. And that part of the transaction is not even subject to the caps of the Interchange Fee regulation. Because the cashback amount of a transaction is usually higher than the sales amount, this %-based fee causes cost that is not related to any turnover for the retailer. From the point of view of retailers, such fees are difficult to justify, considering that providing access to cash is a service generally provided by banks to consumers. In other countries cashback is not provided due to the risk of having cash available at a cashiers' desk. And it's inconvenient to provide these services in the morning to customers and SME neighbours, when the store hasn't received a lot of cash yet, leading to unpleasant discussions with consumers at the till. Consumers can withdraw cash normally at no cost, while merchants have to pay for cash withdrawals. **This is unfair**.

d. Cross-Border Cash Collections

The market for Cash-In-Transit (CIT) services is marked by a sustained consolidation over recent years. An important factor is the continuous decline in cash payments in shops, which results in CIT service providers transporting fewer Euros per trip or having to make longer trips to collect the same amount of cash. This increases their unit costs and makes their business less lucrative. This cost increase comes on top of other economic pressures, such as the recent surge in inflation, shortage of qualified labour or rising energy prices. In face of these developments, some CIT service providers have decided to close their businesses. The decline in the number of CIT service providers has contributed to a trend towards monopolisation, which we witness in Member States across the entire European Union. This monopolisation leads to several negative consequences for users of CIT services, such as retailers.

Monopolisation leads to a lack of competition, which impedes price negotiations and results in higher prices for merchants.

To minimise costs, retailers lengthen cash collection intervals, which lead to higher cash amounts being transported with each collection. This increases the overall level of risk in connection with CIT services and insurance companies refuse to insure excess of cash in vaults of the damage caused by ramming the shop front with a vehicle.

Market consolidation prevents merchants from effectively applying a policy of risk diversification i.e., using several companies to meet their CIT needs.

CIT service providers offering cross-border collections could help address this situation, but they are currently not widely available. The existing EU regulation on cross-border transport of euro cash by road between euro-area Member States (Regulation (EU) No 1214/2011) has in our view failed to facilitate the cross-border provision of CIT services. The main obstacles, which continue to keep CIT companies from offering their services across EU borders, are differing security requirements, for example weapon laws and linguistic requirements.

3. Our position

a. Cash handling costs

For the foreseeable future, cash will continue to be widely accepted as a means of payment in the commerce sector. Retailers want to serve customers. And as long as customers want to pay with cash, retailers will continue offering cash acceptance on a voluntary basis. However, acceptance of cash should not be mandatory.

If a political decision is made to introduce mandatory acceptance of cash, politicians should understand that the resistance from retailers is *not only* because they are stuck. When retailers are forced to accept cash and are not allowed to pass on the costs, they can only absorb rising costs in their cost price without any bargaining power and thus indirectly pass it on to consumers.

Politicians must also understand that the negative side associated with cash is significant for retailers and does not fit in with a retailer's duty to create a safe working environment for his employees or to contribute to a safer society.

Retailers would like to accommodate customers who still need to pay with cash. If, however consumers turn away from cash under levels of 10% of all merchant's transactions and the cost of that transaction is more than 3 times expensive than other means of payment, a retailer should be allowed not to accept cash anymore or should be able to charge for the usage of cash.

In case of mandatory acceptance of cash, the resulting costs should be legally capped at a maximum and fair rate & competitive in comparison with other efficient means of payment. Cash related costs for transport, change money, processing, deposit and receival should be carefully monitored.

A physical store should not be forced to accept cash, when everyone accepts that paying online with cash is not possible. The government and the financial sector should invest in supporting people in a vulnerable position to migrate at their own pace to a digital society in the context of digital inclusion.

Where regulatory measures exist to oblige merchants to accept cash payments, appropriate exemptions should be foreseen i.e., for unattended stores or for retail outlets operating at night-time. The regulatory proposal does not include any exemptions for these unmanned use-cases, which further include unmanned fuel stations, EV-chargers, car/bicycle/scooter sharing, public transport and parking ticket machines and many more. Cash acceptance in these cases is impractical, very expensive and unwanted by consumers.

Also, it is imperative to limit the increase in cash handling and other associated costs, which are set to turn into a serious disadvantage in comparison to non-cash payments. The efforts of regulators should be aimed at keeping the use of cash affordable for entrepreneurs and thus for consumers, rather than make the acceptance of cash mandatory without keeping it affordable and put the burden on entrepreneurs. Cross-subsidisation of different payment methods should be avoided.

The provision and acceptance of cash is not separate just because it's 'public', but for retailers it is part of the wider payment eco-system. However, cross-subsidising between different means of payments is not the answer.

Consumers deserve to know the costs of different payment methods, so they can make an informed choice. Even if those costs can't be charged separately yet due to surcharging prohibitions.

b. Access to cash

As part of their public service, governments and central banks need to ensure a minimum level of cash infrastructure, including access to enough coins at affordable costs that can compete or can be compared with other payment methods.

c. Cashback

Banks should be legally obliged to maintain a minimum infrastructure to provide consumers and retailers with easy access to cash. This obligation should not be passed on to the commercial sector – Cashback is not the silver bullet solution for the challenge to ensure cash availability to the public.
As a result, it is appropriate for regulators to ensure that fees for cash-back services are not charged to retailers. Banks should be prohibited from charging merchants for delivering a service, which the banks outsourced to merchants in the first place. And in the end of the day, it is fair that consumers pay for cash withdrawals / the use of cash, either by paying a fixed amount as part of their account fee and/or to pay a fee for each withdrawal.

In addition to the fees charged by banks, offering cashback services results in additional costs for the retailer. To compensate for these additional costs, banks should also encourage merchants to provide cashback services by offering them a compensatory fee, like a "reverse interchange fee". If the amount of cash that is being used even decreases further as is shown in other Northern European countries, and it is a political decision to maintain the cash infrastructure for people in vulnerable positions that cannot keep up with the pace of digitalisation, it even should be possible for governments to subsidise a significant part of the fixed costs of the infrastructure.

We welcome the provisions in the 28 June Commission proposals[3] for the 3rd Payment Services Directive and Payment Services Regulation, where offering cashback WITHOUT a purchase is defined as not providing a payment service. Whilst the recitals of both proposals make clear that such service would be voluntary, the respective Articles 37 (1) (PSD3) and 2 (2) (e) (PSR) should include those words too.

d. Cross-Border Cash Collections

The status quo in the CIT sector is not satisfactory for retailers operating in multiple Member States. The number of companies offering CIT services in a cross-border setting is perceived as too small, which leads to a lack of choice and drives prices for business customers of CIT services. Regulators should consider taking appropriate measures to achieve a proliferation of cross-border CIT services in the Single Market. Based on feedback from CIT companies, the biggest potential for improvement lies in the harmonization of security and language requirements.

Contact:
Atze Faas | Payments Adviser, faas@eurocommerce.eu

[3] https://ec.europa.eu/commission/presscorner/detail/en/ip_23_3543

4. Annex: Table of cash acceptance by country

COUNTRY	Cash acceptance mandatory? If yes, any limitatons/ exemptions?	Cashback allowed? Limits?	Limits for cash C2B payments	number of CIT providers	Remarks
Austria	yes; Scheidemünzengesetz § 8, 3.3: „allen übrigen Personen im Ausmaß von bis zu fünfzig Stück gemäß Artikel 11 der Verordnung (EG) Nr. 974/98 über die Einführung des Euro, ABl. Nr. L 139 vom 11. Mai 1998, davon Scheidemünzen gemäß § 12 Abs. 1 Z 1 und Z 3 jedoch nur bis zu zehn Stück und bis zu einem Gesamthöchstbetrag von 1 000 Euro“	yes, no limits but recommendation max 200€	no, payments of 10.000€+ need additional ID checks based on law against CTFML	2	additional fees für coin rolls from OenB 0,055€ per roll
Belgium	yes; cash & card	yes, no limits known	max. 3.000€	2 (Brinks/loomis)	significant issues with provisioning of coins (0,05€; 0,10€, 0,20€, 0,50€); resulting in order limitations and/or no deliveries
Cyprus	yes	ja	max 10.000€	max 2	none
Estonia	Yes. No exceptions.	Cashback allowed, not known if max limits are defined	7,000 EUR	2	-
Finland	It is not mandatory, but the Bank of Finland published its guiding principles for the maintenance of cash services in 2018. Those include "Cash must be accepted as a means of payment for services that are of critical importance to members of the public"	It is allowed and there are no limit, but the Bank of Finland's guiding principles for the maintenance of cash services include "Retail stores' casback service for cash withdrawals should be available equally to all customer"		2 (Loomis Suomi Oy ja Nokas Finland Oy)	Private costs of retailers, 2018. Cash: Total costs (EUR million) 73.7, Internal costs (EUR million) 19.0, Unit costs €0.11 (https://publications.bof.fi/bitstream/handle/10024/52260/A129.pdf) Cash guiding principles: https://www.suomenpankki.fi/en/money-and-payments/
France					
Germany	yes, Münzgesetz §3 Abs. 1 Satz 2, if amount is bigger then 50 coins while the total bill is below 200€; individual agreements between both parties accepting not to pay with cash	yes, general limit is 200€ not sure if regulated by law	no, payments of 10.000€+ need additional ID checks based on law against CTFML	~ 26	
Greece	yes	yes	max 1.500€	~ 8	40% of net-income has to be spent via card; significant issues on provisioning oc change coins due to geography (islands/mountains) in combination with closing of national bank branches
Ireland	No, if a business doesn’t clearly state that it only accepts certain methods of payment, it must accept cash (legal tender). A business does not have to accept cash if there are safety concerns. For example, they can’t store the money safely. This also applies if a business runs out of change.	yes, no	no	5	
Italy	Yes, it is mandatory. According to Bank of Italy, merchants cannot refuse cash payments, unless both parties have agreed to use a different means of payment.	yes, but not know that it is offered by anyone	4.999,99€ is the maximum amount payable in cash for a single transaction	14+	In order to work on italian territory as a cash-in-transport company, it is necessary to obtain a local authorization by the Prefect. It does not exist a national authorization. At the moment, in Italy there are 14 company with different territory permissions. Than there are a few bigger companies that represents and work, through a contract of mandate without representation, for all the smaller local companies coordinating the relationship with customers
Latvia	yes, no exeptions	yes, limits not known	10K €	2	

COUNTRY	Cash acceptance mandatory? If yes, any limitatons/ exemptions?	Cashback allowed? Limits?	Limits for cash C2B payments	number of CIT providers	Remarks
Lithuania	No, It is not mandatory. In the legal acts of the Republic of Lithuania, regulating the use of cash euros and other forms of payment and settlement methods (Article 6.929 d. 1 of the Civil Code of the Republic of Lithuania), it is not provided to ensure the possibility of payment only in cash. It is important to mention that from 2022 November 1 the Law on Restriction of Cash Payments of the Republic of Lithuania entered into force (more information in limits for cash B2B).	yes, max amount negotiated by companies (max. 100€ seems common)	no, starting 01NOV2023 for payments above 5K€ the following applies: From 1st of November 2023 settlements, as well as any other payments according to transactions, can be made in cash, if they do not exceed 5.000,00 EUR or an amount corresponding to this amount in foreign currency. When payment service providers do not provide the necessary services at the place of settlements or payments, and it is necessary to pay the transaction immediately, it will be possible to pay in cash for more than 5.000,00 EUR, but the person receiving (accepting) the payment must notify Tax Authority about this within 10 days. The notification will also need to specify the circumstances that prevented non-cash payment and provide the identification data of the parties to the transaction	2	
Luxembourg					
Malta	yes, excemptions on "good faith principle"	yes, only with purchase	max 10K€ if the following goods are traded: 1.antiques; 2.immovable property; 3.jewelry, precious metals, precious stones and pearls; 4.motor-vehicles; 5.sea-craft; and 6.works of art.	3+	
Netherlands	Not yet. Discouraged in Covenant. "Cash only' possible, but not if you're only seller (pharmacy, you passport, ...)	yes. But every once in a while discouraged by PSP "Scheme rules don't allow them", because they are not within contract of debit card (=max. 6 eurocent), nor interchange fee. "Should be charged for separately". Returning question. It is allowed but hardly done. SME's wull (ab)use large storen by coming in and ask them to change 50 euro notes into 5-s	Currently: If C of B somewhere pay more than 10.000 cash, you should report it to FIU. Proposal: Legal cap of max. 3.000 payment in cash (AML legislation)	1-2 only. Brink's has market share >95%. SecureCash and RCCS went bankrupt last 4 years. RCCS taken over by Ziemann Gruppe, but hardly market share.	cost of cash: >> in 2014 when cash was 50% of trx and debit 44%, total cost of cash €0,25/trx and debit €0,19 >> in 2017 when cash was 40% of trx and debit 53%, total cost of cash €0,29/trx and debit €0,17 >>> >> in 2020 when cash was 24% of trx and debit 70%, total cost of cash €0,49/trx(!) and debit €0,19. currently 96% of all shops accept cash. Service levels cash are: - 99,8% of all citizens can reach ATM within 5km range - 92,6% of all citizens can deposit banknotes within 5km - 98% of all entrepeneurs can deposit a sealbag within 20 minutes driving distance - 98% of all entrepeneurs can get coin rolls within 20 minutes driving distance - uptime ATM machines 97% between 8-22h. At nighttime after 23 ATMs can be closed when hazardous (and police asks) - 80% of entrepeneurs can deposit coins within 5 km range
Portugal	Yes, but without penalties defined in case of no compliance	Yes, but is not used to give this service. All the retail stores have al teast 1 ATM in the premises	Yes: 1000€ if the cliente is a company 3000€ for "normal clients"	3: Loomis, Esegur, Prosegur	Cash withdrwas with debit cards free by law
Slovakia	yes, it is legally mantatory (can only be refused on reasonable or generally applicable grounds (e.g. difficulties in securing sufficient cash reserves for issuance or specific physical security risks due to the presence of large volumes of cash).	yes, max 50€	15K€	3	
Slovenia	yes, max 50 coins, excemption based on "good faith principle"	open	max 5K€	open	
Spain	yes, Applicable law: 82.4 del Real Decreto-ley 24/2021, de 2 noviembre	yes, max. limit defined between bank & company	1000€; applicable law_ Dispocicion 11473 del BOE num. 164 de 2021	3	The law which regulates the CIT companies is very restrictive. It implies a higher cost for the cash acceptance.
Spain	Yes according to the Art.17.ñ of the Royal Legislative Decree 1/2007.	Yes. We don't have the information about de Limits.	According to the art. 18 Law 11/2021, a resident holds a limit of 1000 € and a non-residente of 10.000 €.	3 providers. Loomis y Prosegur have 100% of the market since Trablisa is only in the Baleares Island.	

COUNTRY	Cash acceptance mandatory? If yes, any limitatons/ exemptions?	Cashback allowed? Limits?	Limits for cash C2B payments	number of CIT providers	Remarks
Bulgaria	Yes, there are legal regulations, and restrictions on payments over to 10 000 BGN /5 000 EUR	Cash back is not banned but it is not widely distributed in Bulgaria	You can pay cash amounts up to 10 000 BGN /5 000 EUR	90% of market concentrated on 2 CIT; in total around 5+ active	In Bulgaria at the moment there are constant problems with the delivery of small coins for change to customers - currently there are no 10, 20, 5 penny denominations. Limitation for buying of small coins are from National Bank
Croatia	no, Acceptance of cash is not legally regulated, only the maximum amount of cash that can be paid in one transaction - 10.000€	yes, Cash-back is nationally allowed. Maximum amounts are regulated by the issuers of the cards, depending on the limits on the cards.	10.000 €	~3	-
Czech Republic	Yes (Act no. 136/2011 Sb., § 5); more then 50 coins don't have to be accepted	Yes - Act no. 370/2017 Sb., § 3mentions that cash back is NOT a payment service, but generally cash-back is a service that can be provided and is provided by several retailers in Czechia. Maximum amount is not defined by law, it is defined by card associations, currently 3.000 CZK per one purchase.	Yes according to Act no. 254/2004 Sb., § 4 the maximum amount is 270.000 CZK.	3	-
Denmark	Yes - Exemptions: Between 10pm	Yes	20.000 kr	2	
Denmark	Yes in Denmark it is legally mandatory to accept the payment method "cash" It is though possible to not accept cash from 22PM to 6AM	Yes, cash-back is nationally allowed. There is no specific limit, but it is defined by each company.	In Denmark we can maximum allow to receive 19.999 DKK with cash.	2	Many grocery stores in Denmark has a limit of cash in the cash box. When the sum of the cash gets higher than that, the rest and big notes has to be put in a separate locked box - to avoid less loss when having thefts and for secure reasons for the cashier.
Hungary	no	yes, possible since 01JUL2023; 2 times a month max 40.000 HUF in total	no, only regualtions for B2B known	2	-
Poland	yes, national law Art. 59ea Abs. 1; exccemptions not applicable for grocery stores	yes, limits to be defined by banks/payment providers	no, only B2B	4+	-
Romania	yes, As per legal provisions, cash (RON - local currency) must be accepted. In addition, retailers with annual turnover higher than 50.000 EUR must also accept payment by debit/credit card.	yes, Cash back (cash withdrawal at the POS when paying by card) is allowed by the law (OUG 193/2002). The maximum amount mentioned in the law is 200 RON/day the technical infrastructure and related costs need to be developed/assessed to be able to provide this functionality	Yes there are maximum cash amounts defined by the law: max. 5000 RON cash payment / day (for companies) and max. 10.000 RON cash payment / day (for individuals)	2	
Sweden	yes, According to the main rule it is mandatory to accept cash (Riksbankslagen 4, 12§). This is not without exemptions, since “freedom of contract” applies there is a possibility to agree on a different payment solution with the costumer, and as long as you clearly inform the costumers that only cardpayments are allowed in the store. The Swedish central bank (Riksbanken) has prompted for legal changes that would ensure that cash could be used for society necessary wares and services.	yes	no, payments of 5000€+ need additional ID checks based on law against CTFML; national trade organization advises not to accept payments over 45K SEK in cash	1	
Norway					
Iceland					
Liechtenstein					
Monaco					
San Marino					
Switzerland	no	yes, max 300CHF defined by MC/Visa	no, payments of 100.000CHF+ need additional ID checks based on law against CTFML	~ 6	

COUNTRY	Cash acceptance mandatory? If yes, any limitatons/ exemptions?	Cashback allowed? Limits?	Limits for cash C2B payments	number of CIT providers	Remarks
United Kingdom	no, It is not mandatory and the UK government "does not plan to mandate cash acceptance. While the government recognises the ability to transact in cash remains important to millions of people across the UK, particularly those in vulnerable groups, it remains the choice of individual businesses as to whether to accept or decline any form of payment, including cash or card. This may be based on factors such as customer preference and cost."	Yes it is nationally allowed. Amounts are not defined by law but by each individual business. The government passed a legislation to enable the widespread adoption of cashback without a purchase as part of the Financial Services Act 2021, which was possible as a result of the UK's departure from the European Union.	No limit by law. Only subject to money laundering rules (>£10k)	3	Only Bank of England issued bank notes are official legal tender in GB. There are multiple issuers of Scottish Bank Notes which are widely accepted outside of Scotland, but there is no legal obligation by businesses to accept non BoE notes
Northern Ireland	no	yes, no	no	3	-

Source: EuroCommerce members

Contact:
Atze Faas | Payments Adviser, faas@eurocommerce.eu

EuroCommerce is the principal European organisation representing the retail and wholesale sector. It embraces national associations in 27 countries and 5 million companies, including leading global players and many small businesses. Over a billion times a day, retailers and wholesalers distribute goods and provide an essential service to millions of business and individual customers. The sector generates 1 in 7 jobs, offering a varied career to 26 million Europeans, many of them young people. It also supports millions of further jobs throughout the supply chain, from small local suppliers to international businesses. EuroCommerce is the recognised European social partner for the retail and wholesale sector.