

MAKE DIGITAL EURO FEE FAIR FOR MERCHANTS

Press release 3 June 2026

ANNEX

What must be improved in the draft compromises for the transitional phase:

1. Unlink euro area uniform fee digital euro caps from ‘comparable digital means of payment’

The digital euro cannot be compared to private sector digital means of payment, due to the fact that its acceptance will be mandatory for merchants, and the absence of credit risk for Payment Service Providers (PSPs) and the absence of ECB scheme or processing fees. Linking it to private sector propositions only incentivises their providers to increase the prices of those to push the digital euro fee caps up. This is already happening.

Instead, we keep advocating for a simple, uniform and permanent fee of 0.1% for transactions up to 40 euro and a fixed fee of 4 cents per transaction for transactions of 40 euro and more.

2. Better definition of ‘comparable digital means of payment’

If ‘comparable digital means of payment’ are to be used at all, it must only refer to **consumer** debit cards of domestic and international schemes, i.e. commercial cards must be excluded, and must **include account-to-account (A2A) based schemes** used in-store and in e-commerce and which are increasingly popular (such as iDEAL/wero in the Netherlands, MB Way in Portugal, Bizum in Spain, and SEPA Direct Debit widely used in Germany). Excluding A2A schemes would only benchmark the digital euro against the most expensive segment of the market, artificially inflating the fee caps, undermining the digital euro's competitiveness rationale and eliminate the digital euro's core value proposition for merchants.

3. Remove the ‘adjustment factor’ for PSP costs

An ‘adjustment factor’ to the digital euro fee model was introduced for the ‘cost of PSPs to connect to the digital euro infrastructure’. Unfortunately, the proposal does not define what ‘connect’ means, how the adjustment factor will be calculated, by whom and how it will be verified; it also ignores the implementation and operational costs of merchants. Merchants prefer to have this uncertainty factor removed all together.

4. Merchants and consumers must receive the benefit from the absence of scheme or processing fees

Merchants and consumers need all or at least a fair part of the benefit of the absence of fees to be passed on to them. The current text only allows for ‘assigning’ a share after the adjustment factor has been applied. This might leave the merchants empty handed if PSPs are successful in padding the ‘adjustment factor’. Merchants need the digital euro

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to make them ‘better off’ so they can cover some of their costs for the digital euro acceptance too and/or for incentivising their customers to pay with digital euro.

5. No fees to be applied to offline digital euro transactions

Because offline digital euro transactions will happen directly between payer and payee, without any involvement of PSPs, **they cannot attract any digital euro fees**. This applies to both inter-PSP fees and Merchant Service Charges.

6. More realistic, simple and transparent ‘no worse off’ provision

To ensure merchants are ‘no worse off’, PSPs would have to compare the proposed euro area uniform cap with the merchant service charge of ‘a comparable digital means of payment’ for each merchant. If the existing fee is lower, that will apply instead of the euro area uniform cap.

However, this approach raises several concerns that can be avoided by applying a simple 0.1% digital fee euro fee for transactions up to 40 euro and a fixed fee of 4 cent per transaction for transactions of 40 euro and more.

Our concerns are: First, merchants must be ‘better off’ due to the absence of scheme or processing fees (see above). Second, ‘no worse off’ will only be true if the merchant service charge that that merchant currently pays for the **cheapest** comparable digital means of payment is used as that merchant’s digital euro fee. Third, merchants who have **more than one PSP in a country** or who **operate in different countries**, will have different digital euro fees per PSP or per country. This whole construct will cause significant administrative burden between PSPs and merchants.

7. Remove fee for funding or defunding to any linked bank account for merchants

No inter-PSP fee for funding or defunding the digital euro account from or to the commercial bank account would apply only if the digital euro account were held **at the same bank or PSP**. However, merchants may have multiple bank accounts or have their bank account at a different bank or PSP. This provision must be amended so that **no fee including no inter-PSP fee**, applies to any merchant funding or defunding. If funding or defunding fees would apply to merchants, merchants would have to be able to hold digital euros. They would no longer agree to zero digital euro holdings.