Joint statement from European merchants

August 2026

Protect store workers from safety, security and health risks: targeted exemption from cash acceptance needed

Merchants are happy to accept consumers paying with cash, despite a consistent decrease in the use of cash for everyday transactions. As a group of European organisations representing the interests of millions of merchants across Europe in key sectors of the economy, we welcome the inter-institutional negotiations on the Regulation (2023/0208(COD)). We agree the fundamental right to pay with and have access to cash must be safeguarded, however any obligation on merchants must remain proportionate, operationally feasible and with **reasonable exemptions**.

Following our earlier calls[1], we are grateful to see that the co-legislators both included amendments in Article 5.1.(c)/(ba) to exempt unmanned use cases from the mandatory acceptance of cash. But it is **not enough**. The presence and handling of cash comes with safety, security and health risks[2]. In cases where such objective and demonstrable risks exist, merchants need the freedom not to accept cash. Its mandatory acceptance must not result in endangering merchants, their staff and their customers.

Targeted amendment needed

We urge the co-legislators to consider a targeted amendment in Article 5.1 of the Regulation as follows (assuming "c)" will be used for an exemption for unmanned use cases):

> d) where the acceptance of cash would lead to objective and demonstrable health, safety and/or security risks. This should include defined time windows and specific high-risk contexts where cash handling poses a disproportionate risk to staff, payers or the general public, provided that other means of payment are available.
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> For the purposes of the first subparagraph, point d), Member States shall establish appropriate time windows and high-risk contexts and include that in their monitoring, remediation and reporting as referred to in Article 7.

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[1] Merchants need reasonable exemptions from the mandatory acceptance of cash - EuroCommerce
[2] JOINT LETTER | Acceptance of cash: workers in the retail and wholesale sector need to be protected - EuroCommerce

A corresponding Recital could read :

"While cash should remain generally accepted as a means of payment, specific high-risk circumstances may justify proportionate limitations on its acceptance. Such circumstances may arise where the acceptance, storage, transport or handling of cash would create objective and demonstrable security, safety and/or health concerns. Any such limitations should remain exceptional and specific, be based on objective and documented criteria, and be subject to appropriate oversight by Member States."

We call upon the co-legislators to:

Introduce **this targeted exemption related to safety, security and health risks, so employers can fulfil their obligation to provide a safe, secure and healthy working environment**, e.g. for night shops, high-risk areas, or on-board aircraft and other means of transport.

We count on you to reach a reasonable and balanced outcome and are ready to discuss these issues.

Airlines for Europe (A4E) https://a4e.eu/

European Association of Corporate Treasurers www.eact.eu

European Regions Airlines Association https://www.eraa.org

EuroCommerce www.eurocommerce.eu/payments.

European Parking Association (EPA), https://europeanparking.eu/

Hotrec www.hotrec.eu

Independent Retail Europe https://independentretaileurope.eu/en

International Air Transport Association https://www.iata.org/

Lease Europe www.leaseurope.org

SMEUnited https://www.smeunited.eu/