Questions: The NPS is interested in the public's views on the timeline and the vision for the NPS, the proposed timeline to 2030 aligns with developments in the area, including EU legislation.

- What are your views on the timeline?
- What would be effective key indicators to measure progress?
- What do you think about the Principles?
- What main issues undermine consumer trust in the Irish payment system?
- What is your vision for the Irish payment system?

# **Questions: Digital Payments/Cash and Cheques**

The previous NPP in 2013 sought to make electronic payments the preferred means of payment for most people and to accelerate the decline in cheque usage. In contrast, a key of objective of this Strategy is Access and Choice by promoting reasonable options for consumers and small businesses.

- Do you think that there is a reasonable level of choice in the payment methods currently available to consumers in Ireland?
- If not, are there any initiatives that could be undertaken in addition to the legislation currently in train at an EU and domestic level, to better promote access and choice?
- How can the NPS continue to support vulnerable groups access to the payment system?

## **Questions: Instant Payments**

Instant Payments are not widely available in Ireland, and there is a lack of consumer understanding of this position due to the availability of close alternatives, as a result the relative poor position of Ireland, compared to our European peers, suggests that initiatives complementing the forthcoming regulation on instant payments may be beneficial.

- What do you see as the challenges to the roll-out of instant payments in Ireland?
- What actions could be taken to support the roll-out of instant payments?
- What are the potential negative impacts of the wider use of instant payments? How could these be mitigated

# **Questions: Payment Fraud**

Security and Resilience are the cornerstone of a well-functioning payment system t capable of being trusted by consumers and small businesses. To ensure continued trust in the Irish system consumers need to have the confidence to make payments without the risk of being subject to fraudulent transactions. Fraud can be divided roughly into two types, authorised push payment fraud and unauthorised payment fraud. Unauthorised payment fraud involves a payment being made without the payer's authorisation. By comparison, authorised push payment fraud, involves the use of social engineering techniques by the fraudster to deceive the payer into making a payment to someone other than the intended recipient or for a purpose other than what led the payer to make the payment

- Given that unauthorised payment fraud constitutes the largest share of fraud levels in Ireland, are there additional initiatives beyond those set out in existing legislation that can be undertaken domestically to address unauthorised payment fraud?
- Are there examples of best practices in other jurisdictions?
- To what extent do you agree that a cross-industry engagement including actors outside the banking and payments sector is needed to adequately address the issue of authorised push payment fraud?
- If so, which sectors and actors are most relevant?
- To what extent do you agree that a cross-industry engagement including actors outside the banking and payments sector is needed to adequately address the issue of authorised push payment fraud?

• If so, which sectors and actors are most relevant?

## **Questions: Open Banking**

Open banking can improve the consumer experience and assist them in managing their financial affairs if rolled out successfully

- What challenges or obstacles are faced by firms and consumers in providing and using open banking?
- What actions could be taken domestically, and by whom, to encourage or facilitate the greater uptake of open banking in Ireland?
- What type of collaboration would enhance open banking in Ireland?

# **Questions: Digital Euro and Crypto Currency**

From a strategic planning perspective, it is difficult to ascertain the number and value of crypto-assets which are used as a means of payment as opposed to speculative purposes. It is important to distinguish between investment and payment to understand the important of crypto-asset payments in the context of the Irish payments ecosystem

- What are the advantages and disadvantages of paying with crypto-assets as compared to other means of payment?
- Can you provide specific use-cases of a crypto-asset a form of payment?

## **Questions: Data Collection and Analysis**

In recent years, it has become clear that there is a gap in the level of data and statistics available on the Irish payments market. Consequently, the NPS will consider the forthcoming new data to be published by the Central Bank, and assess the extent to which it addresses the existing data gaps as well as considering further research and analysis on payment

- The NPS team has identified data gaps in the areas of open banking, instant payments, sustainability and crypto payments, do you agree that data in these areas are lacking?
- What metrics should be considered to maximise insight into these sectors and while recognising the key role of the Central Bank, which organisations are best placed to collect and analyse these?
- Are there other data gaps in the Irish payment ecosystem that, have yet to be identified?
- What metrics should be considered to maximise insight into these sectors and which organisations are best placed to collect and analyse these?
- What research and analysis topics would be most informative to determine the preferred direction of travel for the future state of the payments system?

### **Questions: Data Collection and Analysis**

The NPS has been asked to assess the impact of the "reasonable access" criteria in the Access to Cash legislation that is currently being developed by the Department of Finance, and look at how they might evolve in the future. The criteria will be focused on (1) distance to cash access/lodgement point and (2) population density at a certain geographic level. The NPS will take a forward looking approach to consider what future cash usage levels could mean for reasonable access to cash and should the criteria change as a result.

- The criteria will be focused on (1) distance to cash
- access/lodgement point and (2) population density at a certain geographic level.
- The NPS will take a forward looking approach to consider what future cash usage levels could mean for reasonable access to cash and should the criteria change as a result.
- To what degree should access to cash be guided by the usage of cash? For example, if the usage of cash falls by 50% from 2022 levels, should the level of access follow in step i.e. by 50% or by a smaller amount, i.e. by 25%?
- If the usage of cash fell by 50% from 2022 levels should other factors be considered when assessing criteria on access, such as usage of cash access points? For example, could the population density criteria be relaxed while the cash access point criteria be held constant?
- If cash usage fell by 50% from 2022 levels, how are factors like cost to be considered to ensure the system is resilient?
- In the long term (5-10 years plus) what level of access to cash facilities are consumers and business expecting to exist?
- Within the Access to Cash legislation, what factors should be considered when the distance and population density criteria are met in order to identify if a local deficiency exists? How should this be addressed?
- Have you (as a consumer or small business) experienced barriers to access to cash? If so, what are they? What would be helpful to counter these?

- Are there situations where you (as a consumer or small business) find cash as a better alternative to digital payments if so, please elaborate?
- In the event of a digital payments disruption, do you see cash playing a role and how might this work?

### **Questions: Acceptance of Cash Private Sector**

The European Commission will develop common euro area wide indicators via the legal tender proposal to monitor acceptance of cash, for example, the density of cash access points in relation to population, withdrawal and deposit conditions, including fees, the existence of different networks with different access modalities for customers, urban-rural and socio-economic variations, and access difficulties for certain population groups. From an Irish perspective, the NPS is interested in the public's view on the acceptance of cash.

- Do you believe there is, or there may be, an emerging trend of non-acceptance of cash in Ireland?
- Where or in what circumstances have you experienced this?
- Do you agree with the principle of universal cash acceptance? Or do you believe it can be limited to certain critical classes of payment?
- Do you believe it remains appropriate or necessary to ensure acceptance of cash as a form of payment?
- Do you believe you have enough choice regarding how to pay for everyday goods and services?
- If monitoring shows that the acceptance of cash is inadequate, what should be considered when developing remedial measures?
- Have people encountered situations where there have been price differences between payment types at the PoS?

- How prevalent/common are these situations?
- How can this be addressed? How do charges at ATMs impact on decisions to use cash?

## Questions Acceptance of Cash – private sector

Public bodies have an obligation to act efficiently in their duties to minimise their impact on the taxpayer and provide a high quality services. While doing so they must also provide fair access to public services. Therefore, ensuring a balance between efficiency and access by the public is important

- What is your view on the levels of acceptance of cash in Ireland by public bodies for public services?
- Have groups or individuals experienced challenges or have been excluded from accessing public services due to the lack of payment methods available?
- What should public bodies consider when offering payment methods for services they provide?
- Should all public services have an obligation to accept or facilitate the acceptance of cash? Or is there a sub-set of essential services that should be obliged to accept cash payments?