Banc Ceannais na hÉireann
Central Bank of Ireland
Eurosystem

Feedback Statement Consultation Paper CP163

Access to Cash: Local Deficiency Guidelines

June 2026

Chapter 1 **Introduction**

Section 8 of the Finance (Provision of Access to Cash Infrastructure) Act 2025 (the Act) requires the Central Bank of Ireland (the Central Bank) to prepare guidelines that set out how it will receive notifications, undertake assessments, and make determinations regarding a local deficiency in cash infrastructure. [1]

On 5 December 2025, we published a consultation paper on the Access to Cash: Local Deficiency Guidelines, CP163. CP163 sets out the proposals for the Local Deficiency Guidelines. The proposed guidelines to consider a local deficiency provide a mechanism to identify and address situations where access to cash infrastructure may be inadequate despite compliance with the access to cash criteria (as set by the Minister for Finance). [2]

Separately, under Section 31 of the Act, the Central Bank is required to introduce regulations prescribing requirements in relation to notifications and appropriate service standards for ATM operators (CP164). We have concluded our public consultation in relation to these requirements and will publish a separate feedback statement along with the regulations in due course.

Consultation Process – Local Deficiency Guidelines

During the consultation period, we engaged publicly and through roundtable sessions with key stakeholders, including bodies representing the interests of consumers, people with disabilities, older people, micro, small and medium enterprises (including retail and hospitality), the designated entities and we consulted with the Minister for Finance. The engagement provided an opportunity for the Central Bank to discuss the proposed guidelines and to listen to the feedback from the public and key stakeholders.

The public consultation period closed on 4 March 2026. We welcomed feedback on one or both parts of the consultation (CP 163 & CP 164) in a single response. The Central Bank received 16 written submissions in total (to both

[1] https://www.irishstatutebook.ie/eli/2025/act/4/section/8/enacted/en/html#sec8
[2] https://www.irishstatutebook.ie/eli/isbc/2025_4.html

consultations (CP163 & CP164)). In February 2026, 15 organisations attended our roundtable.

We would like to thank all parties who took the time to engage with us and/or make a written submission (see Appendix I). This is an important part of informing the policy development process. Copies of the written submissions received are available on the Central Bank's website here.

This paper summarises the feedback received on CP163 and sets out the Central Bank's response to this feedback. It is intended to be read in conjunction with the original consultation document CP163 and makes reference to proposals and terms used in CP163 and the associated Annex that can be found on the Central Bank's website here.

In addition to this chapter (Introduction), this Feedback Statement comprises 3 further chapters (chapters 2-4).

Chapter 2 provides an overview of the feedback received on the principal proposals set out in CP163 and our response to this feedback.

Chapter 3 provides an overview of some more general feedback received and our response to this feedback.

Chapter 4 is our conclusion.

This Feedback Statement also includes the following Annexes:

- Annex 1: Access to Cash: Local Deficiency Guidelines

Chapter 2 **Feedback on Principal Proposals**

CP163 set out, and sought feedback on, our principal proposals to deliver local deficiency guidelines, in line with the requirements set out in the Act covering the following items:

- Notification: Information to be provided
- Notification: Manner of assessing a notification
- Determination: Manner of making a local deficiency determination

- Determination: Circumstances in which the local deficiency concerned be remedied

The Act intends to preserve the level of access to cash infrastructure at least at December 2022 levels, adjusted to take account of changes that arose as a consequence of the exit of Ulster Bank Ireland DAC and KBC Bank Ireland plc from the market. Accordingly, we judge that the intent of the local deficiency provisions is not to necessarily increase the aggregate amount of access to cash infrastructure in the State, but rather to ensure that there remains sufficient and effective access to cash infrastructure for the public and SMEs throughout the State.

We aim to ensure a consistent, fair, and transparent process that enables us to make a determination as to whether a local deficiency has been identified in the locality concerned and whether it is appropriate and proportionate for that deficiency to be remedied.

The sections below summarise the feedback provided by stakeholders by way of written submissions and through our engagements during the consultation period. These sections also outline our response to the feedback including where we have introduced changes or clarifications to address issues raised with us.

Notification: Information to be provided

Overview of Proposal

As per Section 8 (1) (b) of the Act, the Central Bank is required to prepare guidelines in relation to the information to be provided to it when making a notification.

We are proposing an online notification process through the Central Bank website. The person making the notification (the Notifier) will be directed to an online notification form for the collection of relevant information. The Central Bank will also facilitate an assisted notification by way of a phone call. Anbody who requires assistance or who is unable to submit a notification through the standard online process can telephone the Central Bank who will populate the notification form on their behalf with the required information.

Question 1: Do you agree with the information to be provided when making a notification to the Central Bank? Is there other information that should be provided?

Specific Feedback

The majority of feedback supported the Central Bank's proposed information requirements in relation to the potential local deficiency.

Stakeholders were generally understanding of the need for the Central Bank to require that information be submitted about the area in question and broadly acknowledged that the local deficiency information requested was necessary in order for an informed decision to be made. Stakeholders also supported the approach of gathering as much information as possible through a simple form that quickly and easily allows people to tell us the problem they are experiencing and to reduce the burden on the Notifier to provide further information later in the process. This should be balanced to make it clear that there will be an opportunity for the Notifier to provide further clarity on the information that they have submitted (if necessary).

Stakeholders suggested that the requirement for the person making the notification to provide personal data was onerous and unnecessary for the purposes intended. Furthermore, stakeholders suggested that it was unnecessary to link the notification to an individual given that the notification would relate to an entire locality or community.

Some stakeholders queried the requirement to provide a specific address or Eircode and suggested that the location of the potential local deficiency could be provided in terms of townland instead.

In addition, stakeholders recommended that it be made clearer that a notification can be submitted to the Central Bank by any person, company, organisation or representative body rather than only individuals.

A number of stakeholders observed that the language used was quite formal and that the guidelines could be written in less legalistic language or that more user-friendly guidance could be made available.

Stakeholders advised that it was important that the notification process itself was not burdensome and recommended that any processes implemented at the outset should remain under review and be flexible and capable of adapting to feedback and improvements over time.

Central Bank Response

Having considered the feedback received, we have amended the relevant guidelines in a number of ways.

A new guideline has been added to make it clear that there are no limitations on who can make a notification and that a notification can be submitted to the Central Bank by any person, company, organisation or body.

The guidelines have been amended to reduce the amount of personal information collected in relation to the person (individual or organisation) submitting the form (e.g. the Notifier's address is now removed) and to make it clear that the information requested is only for contact purposes if the Central Bank needs to seek additional information or clarity on the information submitted.

The guidelines have also been amended to make it clear that the Central Bank will not publish the identity of the person (individual or organisation) making the notification or publish any information to make them identifiable.

The guidelines have not been amended to incorporate townland as the specific location of the potential location deficiency. A link to Eircode finder will be included in the form to ease the notification process. An Eircode is necessary so that we can accurately consider the local area and avoid any lack of clarity on the area concerned.

The guidelines have been amended to use less 'formal' language where possible. We will provide user-friendly information regarding the guidelines and notification form on the Central Bank website.

We believe that frequent review of all processes and any underlying timeframes is important. We will periodically consider the underlying processes and the timeframes to ensure that they continue to align with stakeholder needs and we will make changes where necessary.

Notification: Manner of assessing a notification

Overview of Proposal

As per Section 8 (1) (c) of the Act, the Central Bank is required to prepare guidelines in relation to the manner in which it shall assess a notification received.

The purpose of this process is to ensure the Notifier has provided sufficient and relevant information in the local deficiency notification, and, that the Notifier has a way to track progress.

Question 2: Do you agree with the proposed manner of assessing local deficiency notifications to the Central Bank?

If not, please explain why

Specific Feedback

Stakeholders broadly acknowledged that the Central Bank approach would facilitate the majority of notifications progressing to assessment.

Stakeholders suggested that there should be more latitude for bilateral engagement between the Central Bank and the Notifier (individual or organisation) before we close a notification due to the absence of relevant information.

Stakeholders were clear that each notification should be easy to track through the key stages in the process and that there should be no way to publicly identify who made a notification.

Response to Feedback

Having considered the feedback received, we have amended the guidelines in a number of ways.

A new guideline has been added to make it clear that where sufficient information has been provided to initiate an assessment, but where there is insufficient clarity to allow the Central Bank to make a determination, that the Bank will provide the Notifier with an opportunity to provide further clarity on the information that has been submitted.

As mentioned earlier, the guidelines have also been amended to make it clear that the Central Bank will not publish the identity of persons (individuals or organisations) making the notification or publish any information to make them identifiable.

The guidelines have been amended to make it clear that each notification will have a unique submission reference, which will be provided to the Notifier when a notification is received. The notification can then be tracked on the Central Bank website using this unique reference.

Determination: Manner of making a local deficiency determination

Overview of Proposal

As per Section 8 (1) (a) of the Act, the Central Bank is required to prepare guidelines in relation to the manner in which it shall make a local deficiency determination.

To make a local deficiency determination, a local deficiency assessment is required. We propose to align our considerations of “local” and “locality” with the CSO and to use established national statistical boundaries at a range of geographical levels including NUTS 3 regions[3], Electoral Divisions (EDs), and, Small Areas (SAs). As part of our assessment process, we will analyse the relevant locality using these boundaries, relevant publicly available statistical data (e.g. population & demographics) and other information available to us (e.g. data received from the designated entities, An Post and ATM operators).

Question 3: Do you agree with the proposal to use the national statistical boundaries as the basis for the Central Bank making a determination on local deficiencies?

If not, please explain why

Specific Feedback

Stakeholders acknowledged that the Central Bank approach of using established national statistical boundaries is a reasonable basis to use and that it would allow for consistency in local deficiency assessments.

A small number of stakeholders observed that Small Areas were too small an area to use as a basis for assessing a locality, given that the level of granularity could increase the number of deficiencies identified.

Response to Feedback

Having considered the feedback received, the Central Bank is not proposing any change to the proposal to use national statistical boundaries as the basis of assessment. We will determine the relevant locality by reference to the Eircode provided in the notification submitted and will use information from EDs and SAs to inform the local deficiency determination. SAs can be considered as a starting reference point, upon which the Central Bank can initiate its assessment in a transparent and consistent manner, which will take into account the overall population that is likely to be affected by any change in cash infrastructure. It should not be interpreted that a statistical area (i.e. ED

[3] NUTS 3 region" means a geographical area in the State that is classified as NUTS level 3 in accordance with Regulation (EC) No. 1059/2003 of the European Parliament and of the Council of 26 May 2003 on the establishment of a common classification of territorial units for statistics (NUTS).

or SA) should necessarily have an ATM or cash service point (CSP) located in them. They are, as stated, useful statistical boundaries with relevant data available upon which to base assessments.

The Central Bank website will include look-up functionality so that the person, before making a notification, can identify the relevant area in question and look to see what access to cash infrastructure is currently in place.

Question 4: Do you have any comments on the way the Central Bank shall make a determination in relation to potential local deficiencies?

Specific Feedback

Stakeholders broadly acknowledged that the proposed Central Bank approach should promote consistency and objectivity in its assessments.

Stakeholders were supportive of basing the assessment on a combination of quantitative and qualitative factors including any relevant information provided by the Notifier in the notification.

Stakeholders requested that the Central Bank considers engagement with the designated entities (and other industry stakeholders) when undertaking an assessment as these stakeholders may be in a position to provide further relevant insights on the locality in question.

Stakeholders advised that the Central Bank should explicitly reference other factors associated with accessing a service that are broader than distance. These might include public transport timetables and travel time.

Stakeholders proposed that the Central Bank should clearly document the decision-making process and provide explicit evidence on how local demographic, geographic, and behavioural factors may influence assessments. It was also proposed that the Central Bank should include clearer decision rules, including minimum evidential thresholds and greater transparency on how competing factors are assessed.

Response to Feedback

The guidelines are clear that the Central Bank can use any available information at its disposal, depending on the circumstances and the particular notification, in undertaking a local deficiency assessment. Having considered the feedback received, we have amended the guidelines in a number of ways.

The guidelines have been updated to explicitly recognise that the Central Bank may also seek additional information from the designated entities, An Post and other ATM Operators, in order to make an informed decision. This engagement will be incorporated into our assessment process.

The guidelines have been updated to explicitly recognise that travel effort e.g. travel time (travel and geographic factors) may be considered.

It is important to note that the Central Bank will have regard to any or all of the matters referred to in Table 5 of the Local Deficiency Guidelines that it considers may be appropriate in the circumstances. Table 5 is not an exhaustive list, and the Central Bank reserves the right to use any available information at its disposal in undertaking assessments. This includes, but is not limited to, any available census data[4] including the various themes explored e.g. “Disability, Carers and General Health” or “Motor Car Availability and Internet Access”, and, also the option of using other available data sets to get further insights e.g. planning applications or the national broadband strategy.

The Central Bank acknowledges a number of observations in relation to providing more granular detail within the guidelines on how specific matters will be addressed. However, given the diverse range of matters being considered (combining qualitative and quantitative information), we are not proposing to update the guidelines in this regard. The outcome of all local deficiency assessments will be published on the Central Bank website.

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[4] Interactive Data Visualisations ¦ CSO Ireland

Determination: Circumstances in which the local deficiency concerned be remedied

Overview of Proposal

As per Section 8 (1) (d) of the Act, the Central Bank is required to prepare guidelines in relation to the circumstances in which it shall make a determination as to whether it is appropriate and proportionate that the local deficiency concerned be remedied.

Where a local deficiency in access to cash has been *determined*, the Central Bank will consider if it is *appropriate* and *proportionate* that the local deficiency concerned be remedied.

Question 5: Do you have any comments in relation to the circumstances in which the Central Bank will consider it is appropriate and proportionate that the local deficiency concerned be remedied?

Specific Feedback

Some stakeholders advocated for the inclusion in the guidelines of a detailed structured assessment of the long-term economic viability, for the service provider (i.e. the designated entities that would be providing the ATM or CSP), of any proposed remedies and for the inclusion of more analytical criteria within the guidelines.

Other stakeholders were of the view that any economic cost (or likely economic cost) of proposed remedies should be borne by the designated entities given their role in the distribution of cash and the importance of cash in society.

All stakeholders acknowledged the Central Bank approach and in general noted that the economic cost of implementation needs to be considered when determining if remediation is required.

Some stakeholders also advocated for the inclusion in the guidelines of a formal test that addresses real world constraints for delivering ATMs or CSPs, including issues like site availability and planning considerations to ensure that an identified local deficiency is capable of actually being remedied from a practical perspective (i.e. there may be areas where it is not considered possible or practical to install an ATM or CSP). Other stakeholders advised that the designated entities need to be creative in delivering proposed solutions and that the legislation was flexible enough to enable the designated entities to deliver the required infrastructure without being prohibitively challenging or costly.

A number of stakeholders also requested that decisions and information in relation to determinations made should be published.

Response to Feedback

The guidelines are clear that the Central Bank can consider any matters that may arise and that we consider relevant for the purposes of making a determination (and that this is not limited to the matters specifically mentioned in the guidelines).

In line with the response to feedback on the local deficiency assessment and given the varying nature of the matters being considered, we are not proposing to update the guidelines in this manner. Each determination will be considered on a case-by-case basis, taking into account the relevant factors for the specific local area.

However, the guidelines have been updated to explicitly recognise that the Central Bank may seek additional information from the designated entities, An Post and other ATM Operators, in order to make informed decisions and that this engagement will be built into our processes.

The outcome of all local deficiency assessments will be published on the Central Bank website.

Chapter 3 **General Feedback**

There was considerable feedback from stakeholders on matters relating to access to cash services, but which are not explicitly local deficiency related. This feedback, while summarily addressed below, has no impact on the guidelines.

Feedback

Stakeholders referenced accessibility more broadly addressing physical access (including being fully accessible to wheelchair users), the built environment e.g. buildings, entrances and exits, and physical safety.

Response to Feedback

The Act (and the guidelines) do not directly address these issues as they are considered under different legislation.

The European Accessibility Act (EAA) aims to increase the availability of accessible products and services for people with disabilities, and to strengthen the accessibility requirements related to those products and services, wherever possible. Under the EAA, the Central Bank of Ireland is responsible for overseeing regulated firms that provide consumer banking services, i.e. credit institutions, payment institutions, electronic money institutions, credit unions, MiFID investment firms and retail intermediaries. More information is available on the Central Bank's website here.

Further detailed information on the EAA is available at:

https://www.gov.ie/en/department-of-children-disability-and-equality/publications/european-accessibility-act/

The Private Security Authority (PSA) is the primary statutory body responsible for regulating security standards for safes and ATM infrastructure in Ireland under the Private Security Services Act 2004 (as amended). [5] The PSA set the standards for installing infrastructure in financial institutions and how ATM

[5] https://revisedacts.lawreform.ie/eli/2004/act/12/revised/en/html

environments must comply with An Garda Síochána guidelines, including advice from the Garda Technical Advisory Group (GTAG).

Notifications to the Central Bank will be addressed in line with an existing Memorandum of Understanding (MOU) between the PSA and the Central Bank.

Further detailed information is available at:

PSA Licensing Requirements – Supplier or Installer of Safes (PSA 94:2024).

Feedback

Stakeholders referenced that there should be a requirement for every town or village with a population of greater than 500 to have at least one ATM with 24-hour access.

Response to Feedback

The Minister for Finance is responsible for and has already specified the access to cash criteria. These criteria apply in respect of each NUTS 3 region in Ireland (namely Border, West, Mid-West, South-East, South-West, Dublin, Mid-East, Midlands) in line with the following:

- There is a minimum percentage of the population that should be within 10 kilometres of an ATM;
- There is a minimum percentage of the population concerned that should be within 10 kilometres of a CSP;
- There is a minimum number of ATMs that should be available per 100,000 people in the region concerned.

The Minister for Finance has not set criteria relating to a minimum number of ATMs to be available outside of normal operating hours.

The Act provides that the access to cash criteria are to be kept under review and there are triggers included in the Act (i.e. a specified reduction in cash usage by the public, a new Census, at the request of the Minister for Finance or by the Central Bank) for such a review.

As previously mentioned, under Section 31 of the Act, the Central Bank is required to introduce regulations prescribing requirements in relation to notifications and appropriate service standards for ATM operators.

We have concluded our public consultation in relation to these requirements and will publish a separate feedback statement along with these regulations.

Feedback

Stakeholders advised that the acceptance of, and ability to pay in, cash was equally important (as access) for different communities. Other stakeholders noted the benefits of undertaking research or further analysis of usage patterns.

Response to Feedback

On the 28th of June 2023, the European Commission adopted a legislative proposal on the legal tender of euro banknotes and coins. The proposal clarifies what legal tender means and sets out the rules for the mandatory acceptance of euro cash and the possible exceptions to the acceptance of cash. It also sets out what Member States need to do in order to ensure that cash is widely accepted and that it can be easily accessed by its users.

This legislative proposal is currently under negotiation at a European level and will apply if adopted in Ireland.

Chapter 4 **Conclusion**

The Central Bank is fully committed to full and open engagement with our stakeholders. In a changing world, we recognise it is essential we are engaged with those who affect and are affected by our work, transparent in our decisions, and open to new insights and perspectives.

CP163 sought to elicit the views of stakeholders on the how the Central Bank will receive notifications, undertake assessments, and make determinations regarding local deficiency notifications.

We acknowledge the different perspectives of all stakeholders and recognise the important role that active public and industry engagement in fostering transparency, clarity and mutual understanding will play in this regard.

We are therefore committed to a regular review of our responsibilities under the Act to ensure they remain fit-for-purpose and reflect any future developments.

Appendix I

Written Submissions[6]
1. BPFI – on behalf of another member ("digital bank") 2. BPFI – on behalf on the designated entities (AIB, BOI, PTSB) 3. Brinks Ireland 4. Euronet Worldwide 5. Irish League of Credit Unions (ILCU) 6. Independent ATM Company 7. Irish Rural Link 8. Irish Hotels Federation 9. Irish Wheelchair Association 10. Musgrave Group 11. National Disability Authority 12. Pivotal (Cash in Transit Solutions) Dublin 13. Retail-FCL 14. RGDATA 15. The Housing Community Recreation and Culture Linkage Group of Westmeath Public Participation Network (PPN) 16. Voice of Vision Impairment
Roundtable Attendees
1. Age Action Ireland 2. Alone 3. Chambers Ireland 4. Consumers Association of Ireland 5. Inclusion Ireland 6. Irish Rural Link 7. Irish Wheelchair Association 8. MABS Support 9. National Disability Authority 10. RGDATA 11. Safeguarding Ireland 12. Sage Advocacy 13. Small Firms Association 14. Social Justice Ireland 15. Vision Ireland / NCBI

6 Please note that submissions were received relating to both CP163 and CP164. However, certain submissions addressed CP164 only, which will be covered in a separate feedback statement to be issued later. Any submissions concerning CP164 only will be published alongside that statement.

Annex 1: Access to Cash: Local Deficiency Guidelines

Link: https://www.centralbank.ie/docs/default-source/financial-system/access-to-cash/access-to-cash-local-deficiency-guidelines.pdf

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