Irish League of Credit Unions
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4th March 2026

Re: Consultation Paper CP163 "Access to Cash Local Deficiency Guidelines" and CP164 "Access to Cash Consultation on Requirements for ATM Operators".

The Irish League of Credit Unions (ILCU) welcomes the opportunity to respond to Consultation Paper CP163 "Access to Cash Local Deficiency Guidelines" and CP164 "Access to Cash Consultation on Requirements for ATM Operators".

The ILCU represents credit unions across Ireland that are member-owned, not-for-profit financial cooperatives with a strong social purpose and deep community roots.

Credit unions provide 42 ATM locations out of the 4,023 ATMs listed in the Quarterly Cash Infrastructure Monitoring Data[1] and are not listed as "Designated entities" under Section 10 of the Finance (Provision of Access to Cash Infrastructure) Act 2025.

The Finance (Provision of Access to Cash Infrastructure) Act 2025 commenced on 30 June 2025 and was a key recommendation from the November 2022 Retail Banking Review. The Retail Banking Review contained a broad mix of recommendations; however, its implementation has been sup-optimal and uneven. We have called repeatedly for Recommendation 11.2 of the Retail banking review[2] to be acted upon namely

"The operation of the Central Credit Register should be amended, following engagement with relevant stakeholders, to:

• Reduce the reporting threshold for credit agreements from €500 to €200 and the consultation obligation threshold from €2,000 to €1,000; and
• Introduce a new lower fee for Central Credit Register consultations for low value loans (i.e., loans of less than €1,000, in line with the proposed changes to the obligatory consultation threshold) to facilitate smaller loans, particularly by credit unions.

The Department of Finance should draft legislation, if the proposed amendments require it."

[1] Quarterly Cash Infrastructure Monitoring Data | Central Bank of Ireland
[2] retail-banking-review-november-2022.pdf

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As there is a lack of data on the level, scale and scope of Buy now, Pay later products and we see this as a financial stability risk.

Overall, the ILCU is supportive of the direction and intent of both consultation papers CP163 and 164. We consider it good practice that new regulations are implemented in a proportionate, carefully sequenced, and well-supported manner that reflects the diversity of the ATM and Cash sector and avoids unintended operational or conduct risks. A review clause should be built in after 2 years and sufficient time given to "grandfather" existing provisions. We do not want to see a case where there is an incentive to reduce the availability of cash.

Key points

1. After consulting widely in the sector, it is our view the Consultation papers are in line with the provisions of the Finance (Provision of Access to Cash Infrastructure) Act 2025;
2. A balanced approach between cost and proportionately should be carried throughout the new regulations;
3. The regulations would benefit from an automatic review after 2 years to ensure they are fit for purpose and aren't haven't a detrimental impact; and
4. Sufficient "grandfathering" provisions should be built in to existing services so as no to create a disincentive to reduce the availability of cash.

Conclusion

In conclusion, the ILCU supports the overarching premise and objectives of the two Consultation Papers (CP163 and CP164) and welcomes its focus on enhancing cash availability.

In terms of the questions raised in the consultation papers, our proposed views are specifically set out in Annex 1. We would be happy to discuss this matter further if that would be helpful.

Yours sincerely,

David Malone

David Malone
ILCU CEO

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Annex 1 – Responses to Question raised

Section 1 CP163 – Local Deficiency Guidelines

Q1. Do you agree with the proposed approach to identifying local deficiencies?

We broadly agree with the proposed structured and evidence-based approach. A transparent methodology provides regulatory certainty and helps prevent unmanaged erosion of cash infrastructure.

However, we emphasise that identification mechanisms must go beyond static geographic mapping. Access is not solely a function of distance; it is a function of practical accessibility.

We recommend examining the feasibility of:

- Incorporating travel time by available transport modes, not just distance.
- Accounting for communities with limited or no public transport.
- Including demographic indicators such as age profile.

A purely geographic threshold risks overlooking vulnerable populations within otherwise “served” regions.

Q2. Are the proposed distance and service thresholds appropriate?

The thresholds provide clarity, but they must be sufficiently protective to prevent slow degradation of services.

In rural communities, even moderate increases in travel time can materially affect access, particularly for:

- Elderly members,
- Persons with disabilities,
- Individuals without private transport.

We suggest:

- A conservative approach to maximum travel distances.
- Periodic review of thresholds.

Q3. Do you agree with the inclusion of qualitative factors?

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We support the inclusion of qualitative and contextual factors. Local cash usage patterns, community dependency, small business reliance, and levels of digital exclusion could be critical indicators. Quantitative metrics alone cannot capture these realities.

Q4. Are the proposed remediation timelines appropriate?

Timely remediation is essential. Prolonged gaps risk behavioural shifts that permanently reduce local economic vibrancy. However, a balance must be struck between reality and remediation. Overly strict rules and regulations may be counter productive, and these regulations can always be reviewed and reassessed. We would suggest a cautious approach and have a review period in two years.

We support clear realistic statutory timelines for:

- Assessment,
- Operator response,
- Implementation of remedial measures.

Interim solutions (e.g. temporary mobile facilities or partnerships) should be considered where permanent solutions require longer lead times.

Q5. Do you have views on monitoring and reporting?

We support:

- Regular public reporting on access metrics.
- Publication of geographic coverage maps.
- Transparent notification when deficiencies are identified or resolved.

Ongoing monitoring is essential to avoid reactive rather than preventative regulation.

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Section 2 CP164 – Requirements for ATM Operators

Q1. Do you agree with the proposed minimum service standards?

We support the introduction of enforceable minimum service standards. An ATM that is frequently unavailable or overly restrictive does not provide meaningful access.

Standards should address:

- Minimum uptime requirements.
- Maximum outage periods.
- Replenishment frequency.

Reliability is central to maintaining consumer confidence. However, a balance between cost and proportionality is required.

Q2. Are the proposed availability and uptime expectations appropriate?

We support high uptime expectations, particularly in designated areas of need.

Repeated outages disproportionately impact vulnerable consumers and small businesses operating on tight margins. We don't have the technical expertise to ascertain whether they are appropriate but would caution against overly strict initial rules to allow the market to develop.

We recommend:

- Reporting of downtime incidents.
- Escalation requirements where persistent underperformance occurs.
- Consideration of higher standards in areas previously identified as deficient.

Q3. Do you agree with the approach to withdrawal limits and denominations?

Yes, with some refinements. Withdrawal limits should reflect real consumer and small business needs. Excessively low limits may require multiple transactions, increasing cost and inconvenience.

Regarding denominations:

- Machines should provide commonly used note values
- Where feasible, a mix of denominations should be encouraged to support everyday spending.

However, we must be cognisant of the fact that the volume of a €5,000 of €20 notes is significantly largely (250 notes) than the size of €5,000 of €50 notes (100 notes).

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Q4. Are notification requirements for material changes appropriate?

We support advance notification obligations for:

- ATM removals,
- Service downgrades,
- Network exits,
- Significant operational changes.

Advance notice enables regulatory assessment under CP163 and allows communities to prepare.

Notification should:

- Be timely,
- Be publicly accessible where relevant.

Q5. Do you have views on proportionality?

We acknowledge the need for proportionate regulation, particularly where smaller operators may face cost pressures and that these are new regulations. We would highlight the balance between cost, proportionality and balance. We would call for an automatic two-year review clause to ascertain the impact of these regulations.

In balancing sustainability and access:

- The public interest in cash infrastructure should remain central.
- Clear standards may support business planning and investment.

However, as states earlier we are a small part of the cash infrastructure in the State.