IRISH HOTELS FEDERATION

SUBMISSION TO

The Central Bank Of Ireland

on

Access to Cash: Local Deficiencies Framework (CP163)

Access to Cash: Requirements for ATM Operators

January 2026

Submission by the Irish Hotels Federation
Access to Cash and ATM network

The Irish Hotels Federation (IHF) welcomes the opportunity to contribute to the consultation on the proposed Local Deficiencies framework under the Access to Cash legislation. Our members operate hotels and guesthouses across urban and rural Ireland and have first-hand experience of the practical impacts of reduced access to cash and related services.

While card and digital payments now dominate many transactions, cash continues to play an important role for certain customer groups, including older people, rural communities, and international visitors. Member feedback indicates that cash typically represents approximately 15% of hotel turnover, rising significantly in adjacent retail settings such as supermarkets, where cash usage can be closer to 35%. Importantly, demand for cash increases sharply when local ATMs are unavailable due to outages or restricted access hours.

Rural Access and ATM Availability
Hoteliers in rural locations note that access to cash is increasingly age-dependent, with older customers relying more heavily on cash. In some villages, a single ATM serves a wide catchment area and dispenses significant weekly volumes, yet access may be limited by shop opening hours where ATMs are located indoors. The absence of alternative ATMs in neighbouring villages compounds these challenges and becomes particularly acute during events or periods of increased local activity.

Foreign Exchange and Tourist Experience
International visitors frequently encounter difficulties accessing cash due to restrictive bank policies. Many banks now require customers to hold an account in order to exchange foreign currency or to exchange large denomination notes. This presents a clear obstacle for tourists and can negatively impact the visitor experience. While some post offices provide foreign exchange services, availability is uneven and often not well communicated, limiting their effectiveness as a substitute for bank services.

Cash Handling and Business Operations
The closure of local bank branches has resulted in hospitality businesses relying more heavily on cash-in-transit services for change supply and lodgements, driven by security, staff safety and operational necessity. In addition, businesses report growing reluctance to accept large notes for small transactions due to fraud risk and difficulties maintaining adequate supplies of smaller denominations.

Recommendations
In finalising the Local Deficiencies Guidelines, the IHF encourages the Central Bank to:

- Ensure that assessments of local deficiencies reflect rural realities, limited ATM redundancy, and restricted hours of access.
- Consider the needs of tourism-driven local economies, including seasonal surges in cash demand.
- Recognise foreign exchange access as a relevant factor in cash availability for communities with significant visitor numbers.

- Encourage greater flexibility in bank foreign exchange policies for non-account holders, particularly tourists.
- Support an expanded and clearly communicated role for post offices in providing foreign exchange and cash services.

The IHF welcomes ongoing engagement through the consultation process and the planned stakeholder roundtable and looks forward to working constructively with the Central Bank of Ireland to ensure the Local Deficiencies framework supports consumers, communities and SMEs across Ireland.

Paul Gallagher

Chief Executive

9th January 2026