RGDATA
LOCAL SHOPS - LOCAL COMMUNITIES

Access to Cash Consultation

Central Bank of Ireland
PO Box 559
Dublin 1
accesstocash@centralbank.ie

27 February 2026

Re: Consultation on Access to Cash Legislation

Dear Sir/Madam,

RGDATA welcomes the opportunity to make a submission as part of the Central Bank of Ireland's consultation on the implementation of the Access to Cash legislation.

RGDATA has engaged directly with the Central Bank on these matters and is pleased to provide additional observations reflecting the practical experience of independent retailers across Ireland.

Key Recommendations

RGDATA understands the objective of ensuring continued access to cash across Ireland, particularly in rural and underserved communities. Independent retailers already play a critical role in facilitating access to cash and supporting local economic activity.

However, the decline in access to cash infrastructure has been driven primarily by decisions taken by financial institutions, including branch closures and the withdrawal of ATM services. It is imperative that retailers should not bear financial or regulatory burdens as a result of measures designed to address these structural changes.

RGDATA therefore recommends that the Central Bank and policymakers:

1. **Ensure retailers are not exposed to increased banking or cash handling charges**
   Financial institutions should not be permitted to charge cash handling fees or impose new charges on retailers because of access to cash requirements. In addition, fee caps and safeguards for SMEs handling cash should be considered.

2. **Require financial institutions to bear primary responsibility for maintaining cash infrastructure**
   Banks and ATM operators, as the primary providers and beneficiaries of cash infrastructure, must retain responsibility for funding, maintaining, and supporting ATM networks, particularly in areas identified as having local deficiencies. There is a strong argument that the Department of Social Protection should also be a designated entity with regard to responsibility for providing access to cash for those on welfare payments.

3. **Establish a formal mechanism for retailers and communities to report cash access deficiencies**
   The Central Bank should create a clear and accessible process through which retailers and community stakeholders can identify and report emerging deficiencies in cash access.

4. **Introduce measures to ensure meaningful stakeholder notification and consultation**
   Retailers and representative bodies should be notified in advance of proposed ATM withdrawals or installations in their areas and given an opportunity to provide input, particularly where communities may be negatively affected.

5. **Consider financial or regulatory supports to sustain ATM infrastructure in deficient areas**
   Where commercial provision of ATM services is no longer viable, policymakers should consider funding mechanisms, shared-cost models, and regulatory obligations on financial institutions to ensure continued provision.

6. **Ensure regulatory obligations on retailers are proportionate and reflect their limited operational role**
   Retailers typically host ATMs but do not operate or control them. Regulatory obligations should reflect this distinction and avoid imposing disproportionate compliance, cost, or security burdens on retailers. The Designated Financial Institutions and the Department of Social Protection must be responsible for funding and delivering access to cash services in cash deficient areas.

About RGDATA

RGDATA represents over 3,500 independent retailers operating in both urban and rural communities throughout Ireland. Our members provide essential retail services and play a vital role in supporting local economies and communities. In many areas—particularly rural locations—the local independent retailer is often the last remaining commercial service provider following the closure of bank branches and post offices.

Many RGDATA members host ATMs or Post Offices and facilitate access to cash services as part of their offering to customers. Retailers recognise that access to cash remains critically important for many consumers, including vulnerable groups, older persons, and those who rely on cash to manage household budgets.

Structural Causes of Cash Access Challenges

The decline in access to cash has primarily been driven by structural changes in the banking sector, including:

- The closure of bank branches in rural and suburban areas;
- The migration of banking services to digital platforms; and
- The withdrawal or consolidation of ATM infrastructure by financial institutions.

Independent retailers have increasingly filled the resulting gap in cash access. However, retailers operate in a high-cost environment and cannot absorb additional costs arising from regulatory interventions designed to address deficiencies created by financial institutions.

In particular, RGDATA is concerned that increased cash circulation could expose retailers to higher banking fees, cash handling charges, and security costs. Managing cash also brings increased insurance and security costs for retailers. Retailers must not be financially penalised for supporting access to cash.

Local Deficiency – Consultation Paper 163

Many independent retailers, particularly in rural areas, have experienced the consequences of reduced access to cash services arising from bank branch closures and ATM withdrawals.

To ensure effective identification and remediation of local deficiencies, RGDATA recommends:

> **Clear criteria for determining deficiencies**, including population size, demographic need, ATM availability, and travel distance.
>
> **A formal reporting mechanism**, allowing retailers and communities to notify the Central Bank of deficiencies or emerging risks.
>
> **Ongoing monitoring**, to ensure deficiencies are addressed sustainably without placing reporting or compliance burdens on retailers.

Independent retailers, due to their central role in local communities, are well positioned to provide practical insight into cash access needs.

Requirements for ATM Operators – Consultation Paper 164

Retailers can be classified as ATM deployers under the legislation, although their role is typically limited to hosting ATMs. Servicing, cash replenishment, and operational management are generally undertaken by ATM operators or financial institutions.

RGDATA recommends:

> **Fair allocation of regulatory costs**, ensuring retailers are not disproportionately impacted by increased compliance, banking fees, or security costs.
>
> **Advance notification requirements**, ensuring retailers and representative bodies are informed of ATM withdrawal or installation plans, particularly in deficient areas.

Recognition of retailers as partners, with appropriate consultation and protection from excessive regulatory or financial burdens.

Conclusion

RGDATA supports the objective of ensuring continued access to cash and recognises its importance to consumers, communities, and businesses across Ireland.

However, it is essential that the implementation of this legislation:

- Addresses the structural causes of declining access to cash;
- Ensures financial institutions retain primary responsibility for cash infrastructure;
- Protects retailers from disproportionate financial or regulatory burdens; and
- Provides appropriate consultation, safeguards, and support for retailers.

Independent retailers play a critical role in sustaining access to cash, but they cannot absorb additional costs arising from measures designed to address deficiencies created elsewhere in the financial system.

RGDATA looks forward to continued engagement with the Central Bank of Ireland as the legislation is implemented.

Yours sincerely,

Tara Buckley

Tara Buckley
Director General
RGDATA