

Consultation Paper 164 Access to Cash: Requirements for ATM Operators

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Introduction

Background

In November 2022, the Department of Finance published the Retail Banking Review (the Review). The Review put forward a set of recommendations for the Retail Banking sector, including recommendations on 'reasonable access to cash'. The Review concluded that, despite a decline in its usage, cash remains an important element of the payments system and the broader economy, and that it is essential that cash remains readily available through ATMs and other means across the country. The Review recommended, amongst other things, that the Department of Finance develop access to cash legislation.

The Finance (Provision of Access to Cash Infrastructure) Act 2025 (the Act) commenced on 30 June 2025. The Act aims to ensure, amongst other things, that there is sufficient and effective access to cash in the State, and that any further evolution of the cash infrastructure will be managed in a fair, orderly, transparent and equitable manner for all stakeholders. 3

The Act gives the Central Bank of Ireland (the Central Bank) responsibility and powers to protect the resilience of the cash system by providing for the regulation and oversight of ATM deployers and Cash-in-Transit (CIT) providers, who must now register with the Central Bank.⁴

 $^{^{1}}$ The Retail Banking review made 34 recommendations, including recommendations on Access to Cash. The final report is available to view <u>here</u>.

² The Finance (Provision of Access to Cash Infrastructure) Act 2025 is available to view here.

³ All new ATMs must fully comply with the accessibility requirements set out in Directive (EU) 2019/882, the European Accessibility Act (EAA). The EAA is an EU law designed to make certain products and services more accessible to people with disabilities which includes product specific requirements on the manufacturing of ATMs.

⁴ Information on the Central Bank's responsibility for registering and overseeing ATM deployers and Cash-in-Transit (CIT) providers is available to view <u>here</u>.

Under Section 31 of the Act, the Central Bank is mandated to introduce regulations (the Regulations) prescribing the requirements for ATM operators in relation to notifications and appropriate service standards, hereinafter referred to as "Prescribed Requirements".

Consultation Paper

The Central Bank is required to make Regulations under the Act where it is satisfied that it is necessary to do so for any of the following purposes:⁵

- the proper and orderly regulation of the business of ATM operators;
- the performance by the Central Bank of its functions; and
- to ensure sufficient and effective access to cash infrastructure for individuals and SMEs.

The Central Bank is satisfied that each of the Prescribed
Requirements is necessary for one or more of the purposes outlined
above and that the proposed Regulations are justified having due
regard to the burden that would be placed on all ATM operators.

This Consultation Paper details the Prescribed Requirements that the Central Bank is proposing to implement through the Regulations (a draft of which is set out in **Annex 1**).

The Prescribed Requirements are set out in the Consultation Paper as follows:

i) Proposed notification requirements that will apply to ATM operators as prescribed by the Act and where appropriate, aligned to the Central Bank's Revised Consumer Protection Code (as applicable) in the context of notifications from retail banks to the public; and

⁵ Pursuant to Section 31(4) of the Act

ii) Proposed service standard requirements for ATM operators as prescribed by the Act.

The consultation process is an important opportunity for the Central Bank to receive feedback and views from interested stakeholders to inform the Prescribed Requirements that will apply to ATM operators.

Proportionate and Targeted Approach

The proposed Prescribed Requirements are designed to achieve their objective in a way that is proportionate and effective, recognising the margin pressures faced by the ATM sector and that ATM operators can range in size and scale. The use of different classes of ATMs ensures that notification requirements and service standard are proportionate to different types of ATM operators. The Central Bank is seeking to ensure that in calibrating the Regulations, ATM operators are subject to appropriate notification requirements and service standards designed to ensure that ATM operators are meeting the cash needs of individuals and SMEs into the future.

Types of ATM Operators

'ATM operators' are defined in the Act and include:

- a) Specified Payment Service Providers⁶
- b) ATM deployers

Payment Service Providers

Payment Service Providers (PSPs) are defined in the Act by reference to the European Union (Payment Services) Regulations 2018.⁷ This is a broad category of firms, of varying scale and complexity, providing a range of payment services.

⁶ As defined in Section 2 of the Act

⁷ Ibid

Certain credit institutions such as retail banks and credit unions are also PSPs and come under this category for the purposes of the Act. Generally, retail banks operate cash withdrawal services from ATMs that are situated on their own branch premises. ATMs situated on the premises of credit unions generally provide cash withdrawal services and are operated by ATM deployers.

ATM Deployers

An ATM deployer is defined in the Act.⁸ ATM deployers operate cash withdrawal services from ATMs they own. They are independent of PSPs, and their ATMs are usually standalone or are situated on premises such as in retailers, hotels, petrol stations and train stations. These ATMs can be stocked with banknotes by the ATM deployer itself,⁹ by a CIT provider or by a retail merchant hosting the ATM.

There are a small number of independent ATM deployers in Ireland, and they own and operate approximately 75 per cent of the ATMs, with the remainder being operated by retail banks.¹⁰

Data Collection and Analysis Exercise

In October 2024, the Central Bank gathered Service Standards Data (SSD) from certain known ATM operators in Ireland.¹¹

The SSD return targeted ATM operators that own and/or operate ATMs and included three retail banks and known ATM deployers that make up most of the ATM network in Ireland.¹²

⁸ As defined in Section 2 of the Act.

⁹ Where the ATM deployer is authorised to provide cash-in-transit services.

¹⁰ The Central Bank (2023) Perspectives on the Evolution of Retail Banking in Ireland. The report can be accessed <u>here</u>.

¹¹ The data submitted by ATM operators was as at 29 December 2023.

 $^{^{12}}$ The data submitted by ATM operators was on a voluntary basis. While not all ATM operators submitted a return, a significant share of ATM operators that make up the ATM network in Ireland provided data.

The SSD return focused on gathering information on current ATM operating standards. The information requested included the following:

- ATM hours of availability;
- Responsibility for filling ATMs (who fills/replenishes the ATM);
- ATM downtime statistics;
- ATM single transaction withdrawal amounts;
- ATM withdrawal statistics:
- ATM functionality (including issuing multiple denominations and issuing receipts); and
- Information included on ATMs (e.g. name of operator, ATM unique ID number, helpdesk phone number).

The Central Bank received information on 3,600 ATMs¹³ with detailed information provided on 2,200 ATMs. The Prescribed Requirements that the Central Bank is proposing to implement through regulations are informed by analysis of the data received.

ATM Operator Classification

For the purpose of the Regulations, the Central Bank has defined four classes of ATMs. The Central Bank is proposing proportionate notification and service standard requirements, where appropriate, for different classes of ATMs provided by retail banks and ATM deployers.¹⁴

The Central Bank expects retail banks, in particular, to ensure that the impact of their decisions concerning the withdrawal of cash services they operate from ATMs, are considered carefully and with a consumer-focused approach. The impact for all consumers must be assessed to ensure changes to branches and in-branch services are

¹³ Total number of ATMs in Ireland is circa 4,200.

¹⁴ As per Section 31 (3) of the Act

undertaken in an orderly manner. This approach aligns with the objectives set out in the Act, which places requirements on certain credit institutions (specifically the retail banks) to ensure continued access to cash services throughout Ireland and protect the resilience of the cash system.

When a retail bank outsources or delegates its ATM operations to an ATM deployer, for ATMs that are located either within its premises or on the exterior of, or external to its premises, the retail bank is still responsible for meeting all the requirements set out in the regulations that apply to both internal and external branch ATMs. This means the retail bank is accountable for the ATM's operation, regardless of whether it is run by an ATM deployer.

It is recognised that some ATMs may be installed on a temporary basis. For the purposes of meeting the prescribed requirements, ATMs installed for one week or less are considered temporary. The prescribed notification requirements do not apply to temporary ATMs, but all service-standard obligations are applicable.

The four classes of ATMs are set out in table [1] below.

Table [1] | ATM Classification

ATM Operator	Class of ATM	Description
Retail Bank (1)	Internal Branch ATM	An ATM in the State located within the premises of a Retail Bank branch.
	External Branch ATM	An ATM in the State located on the exterior of, or external to the premises of a Retail Bank branch.

ATM Deployer	CIT provider filled ATM ^{(2) (3)}	An ATM in the State where an ATM deployer provides cash withdrawal services, in respect of which a CIT provider stocks the ATM with banknotes.
	Merchant filled ATM	An ATM in the State where an ATM deployer provides cash withdrawal services, in respect of which the merchant to whom the ATM is provided, can stock the ATM with banknotes.

Note (1): Where a Retail Bank delegates or outsources the operation of an ATM, that is located either within its premises or on the exterior of, or external to its premises, to an ATM deployer, for the purposes of the regulations the Retail Bank will be responsible for meeting the requirements set out in the regulations for Internal Branch and External Branch ATMs.

Note (2): Where a credit union provides access to an ATM, these ATMs will fall under the classification of CIT provider filled ATM for the purpose of the Regulations.

Note (3): For the purpose of the ATM service standards all temporary ATMs, will be classed as CIT provider filled ATMs.

The Central Bank wants to hear your views on the following questions:



Do you have any views on the proposed classification of four types of ATM provider?

Are there any additional types of ATMs which may not fall within the scope of the above four classes?

Prescribed Requirements: Notification Requirements and Service Standards

Prescribed Notification Requirements

As referenced in the Act, the notification requirements address:

- Notification to the Central Bank by an ATM operator of any proposed changes to its business which may materially alter the scope of its provision of cash services to consumers including:
 - (i) the planned withdrawal of one or more ATMs;
 - (ii) the installation of one or more ATMs in additional locations; and
 - (iii) any plans to cease carrying on business as an ATM operator in the State or any part of the State.
- Notification to the Central Bank by an ATM operator of any change of ownership of the ATM operator;
- Notification to the Central Bank by an ATM operator immediately after the ATM operator becomes aware of any closure of an ATM in circumstances beyond its control; and
- Notification of any planned changes in respect of the services that an ATM operator provides relating to ATMs.

These provisions seek to:

 Assist in ensuring ongoing compliance with the access to cash criteria; ¹⁵

 $^{^{15}}$ The access to cash criteria is specified in Section 5 of the Act and includes, but is not limited to, the minimum number of ATMs that should be available in a particular region and the minimum percentage of the population which should be within a certain radius of an ATM or cash service point.

- Allow for circumstances where it is reasonable that an ATM operator will not be able to provide advanced notification to the Central Bank; and
- Ensure ATM users are given advance notice of changes to ATM services.

(**Note:** Notification requirements do not apply to ATMs installed on a temporary basis.)

Proposed Changes to Business Notification Requirements

The Regulations require an ATM operator to notify the Central Bank of any proposed changes to its business that may materially alter the scope of its provision of cash services.

The Regulations also require an ATM operator to provide a notification to the public by placing a notice on or directly beside the ATM, advising of any proposed changes to its business that may materially alter the scope of its provision of cash services.

The notification periods that apply will depend on what is being addressed in the notification. Where applicable, the notification periods reflect the provisions of the Act and align, where appropriate in respect of notifications from retail banks to the public, with similar requirements in the revised Consumer Protection Code. 16

The different change of business scenarios and the notification periods are set out in tables [2] and [3] below.

Withdrawing or Installing of ATMs

Where an ATM operator plans to withdraw one or more ATMs, they will be required to notify the Central Bank. They will also be required to provide a notification to the public, by placing a notice on or

These requirements can enable the Central Bank to monitor compliance with the access to cash criteria and notify the public of upcoming changes to the cash infrastructure.

¹⁶ Code Regulation 125 (1) and (2) "<u>Procedure to be complied with on ceasing to operate, merging business or transferring regulated activities</u>"

directly beside the ATM, advising ATM users of any plans to withdraw one or more ATMs.

The notification periods that apply to retail banks, in respect of notifications to the public, align to the current Consumer Protection Code requirements relating to 'change to business' notification periods (e.g. bank branch closure)¹⁷ and the requirements to give information and protect consumer interests when significantly amending local branch services.¹⁸

Where an ATM operator plans to install an ATM in an additional location, they will need to inform the Central Bank in advance of installing the ATM.

The notification periods are set out in table [2] below.

Table [2] | Proposed change to business notification requirements

Proposed change to business	Notification to Central Bank - period in advance	Notification to the public to be put on or directly beside the ATM - period in advance
The planned withdrawal of one or more ATMs ¹⁹	Retail Banks: 4 months All other ATM operators: 2 months	Retail Banks: 4 months All other ATM operators: 2 months
Installing one or more ATMs in an additional location	All ATM operators: Notification to be made to the Central Bank in advance of installing one or	N/A

¹⁷ Code Regulation 125 (1) and (2)

¹⁸ Code regulation 160 (1)

¹⁹ As per Act 31(2) – "notification period to Central Bank must not be less than 2 months"

s in an location

Plans to cease carrying on business as an ATM operator

Where an ATM operator plans to cease carrying on business as an ATM operator in the State, they will be required to notify the Central Bank. They will also be required to provide notification to the public, by placing a notice on or directly beside ATMs they operate, advising ATM users of any plans to cease carrying on business as an ATM operator in the State or any county or region of the State.

The notification periods that apply for retail banks, in respect of notifications to the public, align to current Consumer Protection Code requirements relating to 'change to business' notification periods (e.g. bank branch closure).²⁰ The notification periods are set out in table [3] below.

Table [3] | Proposed change to business notification requirements

Proposed change to business	Notification to Central Bank - period in advance	Notification to the public to be put on or directly beside the ATM - period in advance
Plans to cease carrying on business as an ATM operator in the State or any county or region of the State ²¹	Retail Banks: 8 months All other ATM operators: 4 months	Retail Banks: 6 months All other ATM operators: 2 months

²⁰ Code Regulations 125 (1) and (2)

 $^{^{21}}$ As per Act 31(2) – "notification period to Central Bank must not be less than 2 months"

Change of ownership of the ATM operator

The Regulations require an ATM operator to notify the Central Bank of any change of ownership of the ATM operator. The notification periods are set out in table [4] below.

Table [4] | Change of ownership notification requirements

Proposed change to business	Notification to Central Bank - period in advance
Change of ownership of the ATM operator - Notification to Central Bank period in advance	Retail Banks: 8 months All other ATM operators: 4 months

Closure of an ATM in circumstances beyond the ATM operator's control

The Regulations require an ATM operator to notify the Central Bank, immediately after becoming aware, of any closure of an ATM in circumstances beyond the ATM operator's control, including:

- (i) the forced withdrawal or unavailability of an ATM where the premises in which it is located is no longer available for the operation of the ATM (for example, the location is subject to a closure order)
- (ii) an ATM is rendered inoperable without notice (for example, is the subject of vandalism) or at such short notice that the ATM operator cannot reasonably be expected to comply with the notification requirements set out under the notification periods in table [2] above.

Prescribed Service Standards:

As referenced in the Act, the Service Standards address:

ATM service standards can ensure that ATM users' cash needs are met.

- the hours during which an ATM shall be available for the withdrawal of cash;
- The amount that may be withdrawn from an ATM in a single transaction:
- the stocking of ATMs with banknotes of different denominations, which shall not be less than 2 different such denominations, at least one of which shall be less than €50;
- maximum periods for which an ATM may be unavailable for the withdrawal of cash during the normal hours of operation of ATMs for the purposes of planned maintenance, including for the purpose of the restocking of the ATM, repair, upgrading or for any other reason;
- signage requirements for ATMs including, but not necessarily limited, to the following:
 - the name of the ATM operator
 - a unique identification number for each ATM
 - a contact telephone number
- the information required to be communicated by an ATM operator to the user of an ATM when withdrawing cash, including the provision of a receipt at the request of the user and the information to be included on the receipt relating to the transaction and the ATM operator; and
- the information required to be published by an ATM operator, including information in respect of the services that an ATM operator provides relating to ATMs and notification of any planned changes to those services, the period of notice to be given in respect of any such planned changes and the form and manner in which that information shall be published.

These provisions seek to:

- Ensure that ATM users have reasonable access to cash withdrawal facilities;
- Keep the ATM 'out of service' experience for ATM users to a minimum;
- Allow ATM users to withdraw reasonable amounts in single transaction – reducing the need to make multiple withdrawals;
- Allow ATM users with limited funds in their account (less than €50) to access these; and
- Increase transparency for ATM users by providing them with a record of their withdrawal, allowing them to identify ATM operators and providing them with information about ATM services.

Hours of ATM availability for the withdrawal of cash

The Regulations set out the hours during which an ATM shall be available for the withdrawal of cash. The Regulations place different requirements depending on the class of ATM. The cash withdrawal availability requirements align with the access to, and opening hours, of the physical locations where ATMs are located. For example, where an ATM is located within a bank branch, shopping centre, supermarket or similar premises, it should remain available for cash withdrawals whenever those surrounding premises are accessible. In contrast, where an ATM is located on a public street that has 24-hour public access, these ATMs are expected to have 24-hour availability for the withdrawal of cash.²²

The different requirements for each class of ATM are set out in table [5] below.

This will ensure that ATM users have reasonable access to cash withdrawal facilities.

 $^{^{22}}$ Note: the draft regulations also prescribe the percentage of time where ATMs can be unavailable for the withdrawal of cash for the purposes of planned maintenance.

Table [5] | Hours of ATM availability for the withdrawal of cash

Class of ATM	Available for withdrawal of cash
Internal Branch ATM	During the time that the branch in which the Internal Branch ATM is located is open for business.
External Branch ATM	During the time that the place in which the External Branch ATM is located is open to the public.
CIT provider filled ATM	During the time that the place in which the CIT provider filled ATM is located is open to the public.
Merchant filled ATM	During the time that the place in which the Merchant filled ATM is located is open to the public.

The proposed approach to the service standards on the hours of ATM availability for cash withdrawal services is informed by data submitted from ATM operators as part of the SSD return. Findings from analysis of the data show that the majority (i.e. 66 per cent) of ATMs are available for more than 12 hours per day.

The Act also provides for the introduction of service standards relating to "any further hours, outside the normal hours of operation of ATMs, during which an ATM shall be available for the withdrawal of cash". In this regard, the Central Bank is proposing to link cash withdrawal availability with the access to, and opening hours, of the physical locations where ATMs are located, so the same service standards can be applied to each type of ATM operator. As such, the Central Bank has decided that it is not currently necessary to prescribe any further

hours, outside the normal hours of operation of ATMs, during which an ATM shall be available for the withdrawal of cash.

The Central Bank wants to hear your views on the following question:



Do you agree with our proposals around the hours of ATM availability for the withdrawal of cash?

If not, please explain why.

Maximum periods that the ATM may be unavailable

The Regulations set the maximum periods for which an ATM may be unavailable for the withdrawal of cash during the normal hours of operation of ATMs for maintenance, including for the purpose of restocking, repairing or upgrading the ATM. The objective of this is to keep the ATM 'out of service' experience for ATM users to a minimum.

This requirement is set as a percentage of the relevant period of time that each ATM is required to be available for the withdrawal of cash (depending on the class of ATM) during the normal hours of operation of the ATM.

Situations that result in the closure of an ATM outside the ATM operators' control (e.g. where the ATM is not available as the premises in which it is located is no longer available to the public for the operation of the ATM or where an ATM is rendered inoperable without notice e.g. power outage) are not to be considered 'unavailable' time for the purposes of these requirements. In such circumstances, as per the Regulations, the ATM operator is required to notify the Central Bank immediately after they become aware that the ATM is rendered inoperable.

This will require
ATM operators to
keep the ATM 'out of
service' experience
to a minimum.

The Central Bank expects that planned maintenance causing downtime for internal branch ATMs is predominantly scheduled outside of the branch's operating hours.

The maximum unavailable periods that apply to each class of ATM is set out in table [6] below.

Table [6] | Maximum ATM unavailable periods

Class of ATM	Maximum % of time unavailable (4)
Internal Branch ATM	2%
External Branch ATM	5 %
CIT provider filled ATM	15 %
Merchant filled ATM	20 %

Note (4): As a percentage of the relevant period of time that each ATM is required to be available for the withdrawal of cash (depending on the class of ATM) during the normal hours of operation of ATMs.

Information submitted by ATM operators as part of the SSD return found that overall ATMs are unavailable for 25 per cent of the time that they are ordinarily accessible for cash withdrawal services. Of the reasons provided for downtime, 15 per cent reported ATM repairs, 37 per cent reported insufficient funds, and 48 per cent reported 'other reasons'.

The Regulations seek to lower the current percentage of time that ATMs are unavailable by placing requirements on ATM operators on a proportionate basis mindful of consumers' access to cash needs, that reduce periods where ATMs are unavailable.

The Central Bank wants to hear your views on the following question:



Do you agree with our proposals for the maximum periods that an ATM may be unavailable?

If not, please explain why

The amount that may be withdrawn from an ATM in a single transaction

The Regulations set out a cash withdrawal amount, which ATM operators must allow users to withdraw in a single transaction. ATM operators must allow at least this amount of cash to be withdrawn in a single transaction. This ensures that ATM users can withdraw a reasonable amount of cash at once, without having to make separate withdrawals.

The Regulations do not prevent ATM operators from allowing a higher withdrawal amount per transaction than the level prescribed.

Different single transaction withdrawal amounts will apply to the different classes of ATM.

The proposed amount of cash that can be withdrawn from an ATM in a single transaction for each class of ATM is set out in table [7] below.

Table [7] | Single transaction withdrawal amount

Class of ATM	Single transaction withdrawal amount of no less than
Internal Branch ATM	€1,500
External Branch ATM	€600

This will allow ATM
users to withdraw
reasonable cash
amounts in a single
transaction and reduce
the need to make
multiple separate
withdrawals.

CIT provider filled ATM	€260
Merchant filled ATM	€180

The data submitted by ATM operators as part of the SSD return informed the single transaction withdrawal amounts proposed. Based on the data received, a majority (over 90 per cent) of internal branch ATMs report having an existing single transaction cash withdrawal amount of more than €1500, while a majority (over 80 per cent) of external branch ATMs reported having an existing single transaction cash withdrawal amount of more than €600.

Data submitted from CIT provider filled ATMs and Merchant filled ATMs, found that a majority of these ATMs (over 90 per cent), reported having an existing single transaction cash withdrawal amount of more than €250.

A minority of merchant filled ATMs, 7 per cent, report having an existing single transaction cash withdrawal amount of less than €200. To ensure limited disruption to ATM withdrawal services and based on the low levels of data received from this cohort of ATMs, the Central Bank has set a lower single transaction cash withdrawal amount of €180 for Merchant filled ATMs. We are interested in hearing the views of those affected by this requirement.

The Central Bank wants to hear your views on the following question:



Do you agree with our proposals on the single transaction withdrawal amount?

If not, please explain why

Stocking of ATMs with banknotes of different denominations

The Regulations set out the provisions for the stocking of ATMs with banknotes of different denominations. Each time the ATM is replenished the ATM operator must ensure that there is an appropriate mix of denominations in the ATM. Specifically, at the time of re-stocking, the ATM operator must ensure the machine offers a reasonable distribution of at least 2 different denominations, at least one of which shall be less than €50. Requiring one denomination to be less than €50 will ensure that ATM users who may have less than €50 in their account have access to the funds they have available through an ATM.

This will help ATM users who have less than €50 in their account to access the funds they have available through an ATM.

Information submitted by ATM operators as part of the SSD return confirm that all ATMs in operation today can dispense multiple cash denominations. Analysis of information from the ATM operators who submitted information on the denomination of the notes dispensed from ATMs, showed 48 per cent of the notes issued were denominations of less than \in 50, consisting of \in 10 and \in 20 notes, and 52 per cent were \in 50 notes.

Central Bank wants to hear your views on the following question:



Do you agree with our proposals on cash denomination stocking?

If not, please explain why

Receipt Information

The Regulations set out the information required to be communicated by an ATM operator to the user of an ATM when withdrawing cash, including the provision of a receipt at the request

The availability of a receipt upon request allows ATM users to maintain a record of each withdrawal.

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of the user and the information to be included on the receipt relating to the transaction and the ATM operator.

This requirement applies to all classes of ATM operator and will allow ATM users to maintain a record of each withdrawal. Information collected from ATM operators as part of the SSD return confirm that all ATMs in operation today can dispense receipts.

The Regulations prescribe the information that must be included on the receipt relating to the transaction as follows:

- i) Details of the cash withdrawal transaction covering, at least:
 - the unique identification number of the ATM machine
 - the location
 - the date and time of withdrawal
 - the amount withdrawn
- ii) Details of the ATM operator including the ATM operator's registered and trading name.

The Central Bank wants to hear your views on the following question:



Do you agree with our proposals on the information that must be included on ATM receipts?

If not, please explain why

Signage Requirements for ATMs

The Regulations set out the signage requirements for ATMs. The information must be displayed upon or directly beside an ATM and be clearly seen and legible by members of the public. These requirements will apply to all classes of ATM operator. The Regulations prescribe the information that must be included on the signage:

This will allow ATM users to identify the ATM and ATM operator.

- (i) the name of the ATM operator
- (ii) a unique identification number for the ATM
- (iii) a contact email address and telephone number for the ATM operator

The Central Bank expects that all signage must be clearly legible and appropriate for the type of document and information it contains.

The Central Bank wants to hear your views on the following question:



Do you agree with the proposals on signage requirements for ATMs?

If not, please explain why

Information that ATM operators must publish

The Regulations set out the information to be published by an ATM operator, including information in respect of the services that an ATM operator provides relating to ATMs and a section for consumers explaining, for example, the type of cards that their ATM machines accept, charges for use, and how errors and complaints are addressed.

This information must be published on a website, maintained by or on behalf of an ATM operator. This requirement applies to all ATM operators.

The Central Bank wants to hear your views on the following question:



Do you agree with the information that ATM operators must publish in respect of the services provided relating to ATMs?

If not, please explain why

This will ensure ATM users can access information about the services that ATM operators provide.

Providing Feedback

The Central Bank welcomes feedback on this consultation paper from interested stakeholders. Stakeholders' views are sought on the proposed requirements for ATM operators under the Regulations as set out in the consultation paper.

The Regulations containing the Prescribed Requirements are set out in **Annex 1** to this consultation paper.

How to Submit a Response

When submitting a response via email, the Central Bank asks that respondents include the following subject heading in their email 'Consultation Paper 164 - Access to Cash: Requirements for ATM Operators' and address their response to:

accesstocash@centralbank.ie. Submissions are also welcome in writing to Central Bank of Ireland, PO Box 559, Dublin 1.

It is the policy of the Central Bank to publish all responses to its consultations on our website. Accordingly, commercially confidential information should not be included in consultation responses.

Information deemed potentially libellous or defamatory will not be published. The Central Bank will accept no liability in respect of any information provided, which is subsequently released, or in respect of any consequential damage suffered as a result.

What Happens Next?

The consultation period will be open for 12 weeks until 4th March, 2026. We will then consider submissions received and publish the final Regulations alongside a feedback statement.

Questions

For ease of reference, the following is a consolidation of each of the questions asked throughout this consultation paper:

Question 1: Do you have any views on the proposed classification of four types of ATM provider? Are there any additional types of ATMs which may not fall within the scope of the proposed classes?

Question 2: Do you agree with our proposals around the hours of ATM availability for the withdrawal of cash? If not, please explain why

Question 3: Do you agree with our proposals on the single transaction withdrawal amount? If not, please explain why.

Question 4: Do you agree with our proposals on cash denomination stocking?

If not, please explain why.

Question 5: Do you agree with our proposals for the maximum periods that an ATM may be unavailable? If not, please explain why.

Question 6: Do you agree with our proposals on the information that must be included on ATM receipts?

If not, please explain why.

Question 7: Do you agree with the proposals on signage requirements for ATMs?

If not, please explain why.

Question 8: Do you agree with the information that ATM operators must publish in respect of the services provided relating to ATMs? If not, please explain why.

Annex 1: Access to Cash Central Bank Regulations

Link: Finance (Provision of Access to Cash Infrastructure) Act 2025

(sections 23, 31 and 33) Regulations 2026.

