



03/03/2022

SP 119/A4.0/2022

BOF/FIN-FSA-UNRESTRICTED

Public

Ministry of Finance  
Minister of Finance Annika Saarikko  
PO Box 28  
00023 GOVERNMENT, FINLAND

## Proposal for a legislative initiative – level of cash services

The purpose of cash services is to maintain equal opportunities for Finnish citizens to participate in economic activity by using the payment method best suited to their purposes. There are many situations in which electronic payment methods are not comprehensively available. Cash is also the only alternative in the event of serious disruptions in electronic payments, and moreover, in daily payment, it is still the only payment method in Finland that can compete with the international payment methods that dominate electronic payments.

Cash services refer to the possibility to withdraw from an account, use and deposit in an account euro banknotes and coins. Access to cash requires that all the sub-areas of cash services function adequately. The provision of cash services is the responsibility of account-holding banks, cash supply companies, incl. cash ATM companies, and retailers.

Under the Act on Credit Institutions, basic banking services include cash deposits and withdrawals within the territory of an EEA Member State. The realisation of basic banking services is assessed annually by the Financial Supervisory Authority. There are no set criteria for the fulfilment of cash services or basic banking services. The current formulation of regulations does not secure the fulfilment of cash services, and they are not expected to remain at a reasonable level if the developments witnessed in recent years continue.

The Bank of Finland monitors developments in cash services as part of its basic duties involving cash supply. The Bank published its guiding principles for the maintenance of cash services in 2018. The key points of the guiding principles concern the right of citizens to make a reasonable amount of cash withdrawals free of charge and the acceptability of cash as a payment instrument in services significant to citizens. The objective of the guiding principles is to secure all citizens equal and adequate opportunities to



03/03/2022

SP 119/A4.0/2022

BOF/FIN-FSA-UNRESTRICTED

Public

withdraw cash from their accounts, to make cash payments and to deposit cash in their accounts. The objective of the legislative initiative is to secure the realisation of the level of services as defined in the guiding principles for the maintenance of cash services also in the longer term.

The outbreak of the pandemic in 2020 further accelerated the decrease in the use of cash and thus weakened the profitability of cash provision services. Cash is legal tender and a payment method equally available to all members of the public, and therefore its position is regulated by Parliament. It is appropriate to launch a legislative initiative defining the level of cash services, access to cash, cash deposits and the acceptability of cash as a payment instrument before cash services shrink to a level that may be considered below reasonable for society as a whole.

Regulation of cash services has been implemented in the other Nordic countries. Measures to secure a sufficient level of cash services have been launched also in, for example, the Netherlands, Latvia, Lithuania and Poland, even though in most of these countries the share of cash in payments or the availability of cash services is notably higher than in Finland.

For further information on the legislative initiative, please contact:

Head of Division Heli Snellman

[heli.snellman@bof.fi](mailto:heli.snellman@bof.fi)

Head of Department Päivi Heikkinen

[paivi.heikkinen@bof.fi](mailto:paivi.heikkinen@bof.fi)

Tuomas Välimäki  
Member of the Board

Päivi Heikkinen  
Head of Department

Appendices

Memorandum