Public consultation on instant payments

Fields marked with * are mandatory.

Introduction

This consultation is now available in 23 European Union official languages.

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The present consultation will inform the Commission on remaining obstacles as well as possible enabling actions that it could take to ensure a wide availability and use of instant payments in the EU. It will also enable the Commission to decide on whether EU coordinated action and/or policy measures are warranted in order to ensure that a critical mass of EU payment service providers (PSPs) offer instant credit transfers. The consultation also seeks to identify factors that would be relevant for fostering customer demand (from consumers, corporate users and merchants alike) towards instant credit transfers.

EU citizens and companies expect to have at their disposal convenient, secure and cost-efficient payment solutions to make their payments, both domestically and cross-border. Instant payments technology can be a powerful enabler for the emergence of payment solutions meeting these expectations. Most credit transfers today reach the beneficiary on the following business day and some even take longer. In contrast, instant credit transfers allow funds to be available on the account of the beneficiary within seconds, 24 hours a day, every day of the year, including weekends and public holidays. This entails potential advantages for consumer and corporate users alike.

For an instant credit transfer to be successfully completed, at each end of the transfer there needs to be a PSP adhering to the same set of rules, practices and standards for the execution of that transfer (a single 'scheme'). For euro instant credit transfers within the <u>Single Euro Payments Area (SEPA</u>) such a scheme was developed in 2017 by the <u>European Payments Council</u> (the 'SCT Inst. Scheme'). A broad level of participation by PSPs in the scheme is a key precondition for the wide availability of euro instant transfers at EU level. As of March 2021, only 64.6% of PSPs located in 21 Member States have joined the SCT Inst. Scheme. Similar schemes also exist in some non euro area Member States for instant credit transfers in their local currency.

Instant credit transfers can be conveniently used in a variety of situations such as purchases in physical shops and online (so called 'point of interaction' with merchants), or person-to-person payments, such as splitting a restaurant bill. This requires the instant credit transfer to be combined with a 'front-end' solution, such as one based on mobile phone applications, e-invoices, standardised messages requesting payments, etc.

The consultation aims at identifying the concerns that would need to be addressed to incentivise EU payments market players to offer innovative, convenient, safe and cost-efficient pan-European payment solutions based on instant credit transfers. At the same time, it would help establish what features and safeguards would enable the users to reap the benefits of instant payments to the fullest.

This public consultation is addressed to a broad range of stakeholders: payment services users (consumers, corporate users and merchants), PSPs and providers of supporting technical services, clearing and settlement mechanisms, relevant public authorities, national regulators and others - all playing an important role in ensuring a smooth transition towards well-functioning and efficient pan-European instant payment solutions.

This consultation follows from the <u>Commission Communication from December 2018</u> "Towards a stronger international role of the euro", which supported a fully integrated instant payment framework in the EU in order to reduce the risks and the vulnerabilities in retail payment systems and to increase the autonomy of existing payment solutions, and the <u>Commission Communication on a "retail payments strategy in the EU" adopted on 24 September 2020</u>, which confirmed the goal of fostering the full take up of instant payments in the EU and listed a number of possible initiatives to support that objective.

The results of this consultation will be used to promote, as part of the Commission's vision for the EU's retail payments market, the availability of competitive home-grown and pan–European payment solutions, supporting Europe's open strategic autonomy in the macro-economic and financial fields, the importance of which was reiterated in the recent <u>Co</u> <u>mmission Communication of January 2021 "The European economic and financial system: fostering openness, strength and resilience"</u>.

If you are a provider of payment services (PSP) or supporting technical services, please note that in addition to this public consultation you are invited to respond to the <u>targeted consultation</u> which contains questions of a more technical nature.

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Please note: In order to ensure a fair and transparent consultation process only responses received through our online questionnaire will be taken into account and included in the report summarising the responses. Should you have a problem completing this questionnaire or if you require particular assistance, please contact <u>fisma-instant-payments@ec.europa.eu</u>.

More information on

- this consultation
- the consultation document
- the consultation strategy
- payment services
- the protection of personal data regime for this consultation

About you

- *Language of my contribution
 - Bulgarian
 - Croatian
 - Czech
 - Danish

- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish
- * I am giving my contribution as
 - Academic/research institution
 - Business association
 - Company/business organisation
 - Consumer organisation
 - EU citizen
 - Environmental organisation
 - Non-EU citizen
 - Non-governmental organisation (NGO)
 - Public authority
 - Trade union
 - Other
- * First name

*Surname

* Email (this won't be published)

* Under which category does your business association stand

- Account Servicing Payment Service Provider
- Payment Initiation Service Provider
- Acquirer
- Provider of other types of payment services
- Technical service provider as defined in Article 3(j) PSD2
- Payment system
- Corporate payment services user
- Merchant
- Other

* Please specify under what other category your business association stands

255 character(s) maximum

* Please specify what kind of Account Servicing Payment Service Provider

- Credit institution
- Payment institution
- Electronic money institution

* Please specify what other type(s) of payment services your organisation provides 255 character(s) maximum

* Under which category does your business organisation or company stand

- Account Servicing Payment Service Provider
- Payment Initiation Service Provider

- Acquirer
- Provider of other types of payment services
- Technical service provider as defined in Article 3(j) PSD2
- Payment system
- Corporate payment services user
- Merchant
- Other

* Please specify under what other category your business organisation or company stands

255 character(s) maximum

* Please specify what kind of Account Servicing Payment Service Provider

- Credit institution
- Payment institution
- Electronic money institution
- * Are you responding on behalf of the banking group?
 - Yes
 - No
 - Don't know / no opinion / not applicable

* Please specify what other type(s) of payment services your organisation provides

255 character(s) maximum

- * Please specify what type of merchant
 - Online
 - Physical presence
 - Both online and physical presence
 - Other

* Please specify what other type of merchant

255 character(s) maximum

*Scope

- International
- Local
- National
- Regional

* Is your organisation a European institution or agency

- Yes
- No
- Don't know / no opinion / not applicable
- *Level of governance
 - Local Authority
 - Local Agency

* Level of governance

- Parliament
- Authority
- Agency

* Please specify what type of Authority

- Supervisory
- Resolution
- Other

* Please specify what other type of Authority

255 character(s) maximum

* Is your organisation a Ministry?

Yes

- No
- Don't know / no opinion / not applicable

* Please specify what Ministry

255 character(s) maximum

* Is your organisation a National Central Bank?

- Yes
- No
- Don't know / no opinion / not applicable

*Organisation name

255 character(s) maximum

*Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

* Please specify if your company is a small and medium sized enterprise (SME) according to the definition provided by EU recommendation 2003/361

- Yes, it is an SME
- No, it is not an SME
- Don't know / no opinion / not applicable

Transparency register number

255 character(s) maximum

Check if your organisation is on the <u>transparency register</u>. It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

Afghanistan	Djibouti	Libya	Saint Martin
Åland Islands	Dominica	Liechtenstein	Saint Pierre
			and Miquelon
Albania	Dominican	Lithuania	Saint Vincent
	Republic		and the
			Grenadines
Algeria	Ecuador	Luxembourg	Samoa

American	Egypt	Macau	San Marino
Samoa			
Andorra	El Salvador	Madagascar	São Tomé and
		-	Príncipe
Angola	Equatorial	Malawi	Saudi Arabia
U	Guinea		
Anguilla	Eritrea	Malaysia	Senegal
Antarctica	Estonia	Maldives	Serbia
Antigua and	Eswatini	Mali	Seychelles
Barbuda	201104111		
Argentina	Ethiopia	Malta	Sierra Leone
Armenia	Falkland Islands	0	Singapore
/ interna		Islands	Cingaporo
Aruba	Faroe Islands	Martinique	Sint Maarten
Australia	Fiji	Mauritania	Slovakia
Austria	Finland	Mauritius	Slovenia
	France		 Solomon
Azerbaijan	FIGILCE	Mayotte	Islands
Dehemee	Create Oriena	Maxiaa	
Bahamas	French Guiana	Mexico	Somalia
Bahrain	French	Micronesia	South Africa
	Polynesia		
Bangladesh	French	Moldova	South Georgia
	Southern and		and the South
	Antarctic Lands		Sandwich
			Islands
Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan
Belgium	Germany	Montenegro	Spain
Belize	Ghana	Montserrat	Sri Lanka
Benin	Gibraltar	Morocco	Sudan
Bermuda	Greece	Mozambique	Suriname
Bhutan	Greenland	Myanmar	Svalbard and
		/Burma	Jan Mayen
Bolivia	Grenada	Namibia	Sweden

Bonaire Saint Eustatius and Saba	Guadeloupe	Nauru	Switzerland
Bosnia and Herzegovina	Guam	Nepal	Syria
Botswana	Guatemala	Netherlands	Taiwan
Bouvet Island	Guernsey	New Caledonia	Tajikistan
Brazil	Guinea	New Zealand	Tanzania
British Indian Ocean Territory	Guinea-Bissau	Nicaragua	Thailand
British Virgin Islands	Guyana	Niger	The Gambia
Brunei	Haiti	Nigeria	Timor-Leste
Bulgaria	Heard Island and McDonald Islands	Niue	Togo
Burkina Faso	Honduras	Norfolk Island	Tokelau
Burundi	Hong Kong	Northern	Tonga
		Mariana Islands	;
Cambodia	Hungary	North Korea	Trinidad and
	-	-	Tobago
Cameroon	Iceland	North	Tunisia
		Macedonia	
Canada	India	Norway	Turkey
Cape Verde	Indonesia	Oman	Turkmenistan
Cayman Islands	Iran	Pakistan	Turks and
			Caicos Islands
Central African	Iraq	Palau	Tuvalu
Republic			
Chad	Ireland	Palestine	Uganda
Chile	Isle of Man	Panama	Ukraine
China	Israel	Papua New	United Arab
		Guinea	Emirates
Christmas	Italy	Paraguay	
Island			Kingdom

 Clipperton Cocos (Keeling) Islands 	 Jamaica Japan 	PeruPhilippines	 United States United States Minor Outlying
ColombiaComoros	JerseyJordan	 Pitcairn Islands Poland 	Islands Uruguay US Virgin Islands
 Congo Cook Islands Costa Rica Côte d'Ivoire 	 Kazakhstan Kenya Kiribati Kosovo 	 Portugal Puerto Rico Qatar Réunion 	 Uzbekistan Vanuatu Vatican City Venezuela
 Croatia Cuba 	Kuwait Kyrgyzstan	Romania Russia	 Vietnam Wallis and Futuna
Curaçao	Laos	Rwanda	Western Sahara
Cyprus	Latvia	Saint Barthélemy	Yemen
Czechia	Lebanon	Saint Helena Ascension and Tristan da Cunha	Zambia
Democratic Republic of the Congo	Lesotho	Saint Kitts and Nevis	Zimbabwe
Denmark	Liberia	Saint Lucia	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

The type of respondent that you responded to this consultation as, your country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself.

Public

Your name, the type of respondent that you responded to this consultation as, your country of origin and your contribution will be published.

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions

User perspective

Note: For the purpose of the questionnaire, instant credit transfers mean either SCT Inst. (euro instant credit transfers), or instant credit transfers in another EU currency.

Question 1. To your knowledge, does your payment service provider (e.g., your bank) provide you with the possibility to make instant credit transfers?

- Yes
- No

- I don't know
- Not applicable

Consumer preferences

Consumer preferences for instant credit transfers (for example in the context of using online banking)

Question 2. Please rate the importance of the reasons/conditions listed below, which would incentivise you as consumer to opt for an instant credit transfer:

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
Need for the funds to be credited to the beneficiary within seconds	0	۲	۲	0	O	0	O
Need for the funds to be credited to the beneficiary within seconds also outside business hours (24 hours a day, any day of the year)	0	O	©	©	©	0	O

Cost (compared with a regular credit transfer)	0		0	0	O
Existence of safeguards regarding the risk of fraud or error (e.g. the possibility to receive an immediate confirmation as to whether the IBAN number of the beneficiary account matches the name featuring on the beneficiary account)					

Oth	her	O	\odot	O	O	O	\odot	0

Please specify to what other reason(s)/condition(s) you refer in your answer to question 2:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Please explain your answers to question 2:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 3. In order to be able to send the funds 24 hours a day, any day of the year (including weekends and public holidays) and be certain that the beneficiary receives the funds within seconds, would you, as consumer, be willing to pay a premium fee for instant credit transfers compared to regular credit transfers?

- Yes
- No
- Don't know / no opinion / not applicable

Question 3.1 Please indicate if possible how much of a 'premium' you would be ready to pay for an instant credit transfer as % increase compared to a regular credit transfer (e.g. 5%, 10%, 50%, etc.):

%

Please explain your answer(s) to question 3:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 4. As consumer, if you opt for an instant credit transfer, do you consider that, in order to prevent the risk of fraud or error, your bank should offer a service allowing, prior to the initiation of the transfer, for the immediate verification of the 'match' between the IBAN of the beneficiary and the name on the beneficiary account?

- Yes, automatically and free of charge for the consumer
- Yes, automatically and I accept that there could be a fee to pay for that service
- Yes, but as an optional service with a fee
- No, I don't believe this is necessary
- I don't know / no opinion
- Not applicable

Consumer preferences for instant credit transfers at point of interaction (e.g. when paying in a shop, making on-line purchases, etc.)

Question 5. Please rate the importance of the factors below which would incentivise you as consumer to opt for an instant credit transfer when paying in a shop or online (at 'point of interaction'):

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
Speed (funds are credited to the beneficiary within seconds, 24 hours a day, any day of the year, e.g. to ensure quicker delivery of goods/services in e-commerce)		O		O	O	O	©
Cost	0	0	0	0	0	0	0
Possibility to ask for a refund (in cases of non-delivery of the goods, damaged or non-conform goods etc.)	©	0	©	O	O	©	O

Possibility to pay in a broad range of places and situations (shops, restaurants, gas stations, public administrations, etc.)		۲			۲	۲	
Possibility to pay not only in your own country but also anywhere in the EU	0	0	0	0	0	0	
Global acceptance (possibility to pay worldwide)	0	0	0	0	0	©	
Convenience (e.g., if used via a mobile payment app /digital wallet no need to carry cash or a card)	O	O	O	©	O	O	

Possibility to integrate in a mobile payment app /digital wallet loyalty points or additional features	O	O	O	©	O	O	©
Presence of a visible label or recognisable brand similar to card brands	0	©	0	0	0	0	©
Other	O	O	0	O	0	0	0

Please specify to what other factor(s) you refer in your answer to question 5:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Please explain your answers to question 5:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Merchant preferences

Question 6. As merchant, please rate the importance of each of the factors below when deciding on whether to offer customers the possibility to pay with instant credit transfers at 'point of interaction':

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
Cost (e.g. lower merchant fees than for cards)	O	0	0	0	0	0	O
Speed: Instantaneous availability of funds 24 hours a day, any day of the year	©	©	0	O	O	O	O
Ability to accept payments from customers from other Member States	0	0	0	0	O	0	O

Seamlessness at check-out (minimum number of steps to complete the transaction)	0	0		O	O	O	O
Availability of a merchant account reconciliation service (i.e. the process of matching a payment recorded in the bank account of the merchant with the sales of the merchant)		٢	٢	O	O	O	O

Availability of an omni- channel point of sale (POS) solution offering payers means of selecting their preferred means of payment (e.g. card, credit transfer, instant credit transfer, direct debit, etc.)	٢	٢				٢
Ability to set up a default selection of payment applications, including instant credit transfer option			0	0	0	©

Availability of services allowing the incorporation of loyalty points of the merchant in the payment method	O			۲	O		٢
Possibility to accept payments without (or with very little) acceptance hardware required (e.g. acceptance integrated in the check outs or using a tablet so no need for a dedicated payment terminal)	0	0	0	O	0	0	©
Other	0	O	O	O	O	O	0

Please specify to what other factor(s) you refer in your answer to question 6:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Please explain your answers to question 6:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Corporate user preferences

Question 7. As corporate user, what benefits do you see in using instant credit transfers? Please rate the importance of the type of benefits listed below:

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
Being able to manage cash flows more efficiently				O	O	O	O
Timely payment of invoices or any other payment obligations	0	0		۲	۲	۲	0

Being able to offer services to clients more efficiently (e.g. provide instant refunds)	O	O		O	©	O	۲
Other	O	0	0	\odot	O	\odot	0

Please specify to what other benefit(s) you refer in your answer to question 7:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Please explain your answers to question 7:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 8. Would an immediate availability of funds enable you to fulfil your obligations (e.g. instant shipment of the order) sooner, compared to the situation when the funds are not immediately available?

- Yes
- No
- Don't know / no opinion / not applicable

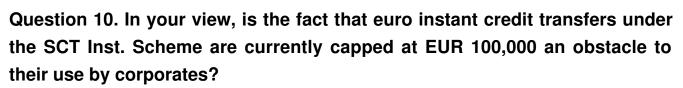
Please explain your answers to question 8:

5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 9. Please explain the potential impact on your internal operations arising from adapting them to instant credit transfers:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.



- Yes
- No
- No opinion
- Not applicable

Question 10.1 Do you think there should be a cap?

- Yes
- No
- No opinion
- Not applicable

Question 10.2 Please indicate at what level the cap should be:

€

Please explain your answer(s) to question 10:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 11. Would the availability of batch processing of instant credit transfers (for multiple payment transactions bundled together), as opposed to the processing per each individual transaction, make the use of instant credit transfers more attractive to corporate users?

Yes No

- No opinion
- Not applicable

Please explain your answer to question 11:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 12. Are there any other obstacles to the use of instant credit transfers by corporates, both domestically and cross-border?

- Yes
- No
- No opinion
- Not applicable

Please identify the other obstacles you refer to in your answer to question 12:

5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 13. What type of value added services would make instant credit transfers more useful from your perspective (e.g. Request to Pay, e-invoicing)? Please explain:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 14. In order to be able to send the funds 24 hours a day, any day of the year (including weekends and public holidays) and be certain that the

beneficiary receives the funds within seconds, would you, as a corporate user, be willing to pay a premium fee for instant credit transfers compared to regular credit transfers?

- Yes
- No
- No opinion
- Not applicable

Question 14.1 Please indicate if possible how much of a 'premium' you would be ready to pay for an instant credit transfer as % increase compared to a regular credit transfer (e.g. 5%, 10%, 50%, etc.):

%

Please explain your answer(s) to question 14:

5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Payment Service Provider (PSP) perspective

Question 15. If you are a PSP providing and maintaining payment accounts for payers, have you adhered to an instant credit transfer scheme:

	Yes	No	l don't know	Not applicable
To the SCT Inst. Scheme	0	0	0	0
To another scheme (for instant credit transfers in an EU currency other than euro)	0	0	0	0

Please specify to what other scheme you refer in your answer to question 15:

5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 16. What benefits do you see, as PSP, in offering instant credit transfers? Please rate the importance of the benefits listed below:

	1 (not important)	2 (rather not important)	3 (neutral)	4 (rather important)	5 (fully important)	No opinion	Not applicable
New source of revenue	0	0	0	0	0	0	O
Attract a larger customer base	0	0	0	0	0	0	O
Preserve the existing customer base	0	0	0	0	0	0	O
Save costs in other areas of operations (e.g. cash management and distribution, ATM maintenance, security costs)	©	©	O	O	O	©	O

Ability to (cross) sell other services	0	0	0	0	0	0	0
Provide an alternative to other widely used means of payment such as cards and therefore generate cost savings and become more independent from other providers				٢	٢		٢
Other	O	0	0	0	0	0	O

Please specify to what other benefit(s)you refer in your answer to question 16:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Please explain your answers to question 16:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 17. In your opinion, could instant credit transfers aggravate bank runs and thus contribute to bank failures?

- Yes
- No
- Don't know / no opinion / not applicable

Question 17.1 Which of the following mechanisms or tools would you consider as useful in addressing this type of intense liquidity outflows?

	Yes	No	No opinion	Not applicable
A daily limit as regards the amount which could be transferred via instant credit transfers	O	©	0	
A discretionary power allowing competent authorities to suspend instant payment obligations of the financial institution concerned for a certain period of time	O	©		0

Other mechanisms that may be available to either PSPs or competent authorities	0	0	0	O
---	---	---	---	---

Please specify to what other mechanism(s) you refer in your answer to question 17.1:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Please explain your answer(s) to question 17:

5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Technical standardisation

Question 18. In your view, should a single European QR code standard for instant credit transfers be available?

- Yes, it should be developed by market participants
- Yes, it should be developed by the European standardisation organisations.
- Yes, for other reasons
- No, I don't believe there should be a single EU QR code standard, because I think that the same objective could be achieved through the interoperability of existing QR codes
- No, I don't believe there should be a single EU QR code standard, because other technologies (e.g. Near Field Communication) are safer and/or more convenient
- No, for other reasons

Please explain your answer to question 18:

5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Horizontal aspects

Question 19. Do you believe that the widespread use of instant credit transfers could trigger risks that could negatively affect operations of a particular financial sector or pose broader societal costs (e.g., in terms of privacy)?

Yes

- No
- Don't know / no opinion

Please explain your answer to question 19:

5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 20. Do you consider that instant payments could bring broader societal benefits, for example in terms of:

	Yes	No	Don't know - No opinion
Financial inclusion	0	0	0
Public health	0	0	O
Data protection	0	0	O
Fiscal benefits	0	0	O

Other types of broad benefits	\odot	\odot	0

Please specify to what other societal benefit(s) you refer in your answer to question 20:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Please explain your answer(s) to question 20:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Additional information

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below. Please make sure you do not include any personal data in the file you upload if you want to remain anonymous.

The maximum file size is 1 MB. You can upload several files. Only files of the type pdf,txt,doc,docx,odt,rtf are allowed