



ESTA views on cross-border CIT

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All European countries will be, sooner or later, touched by this forthcoming legislation:

- ✓ already Euro zone
- ✓ soon in Euro zone
- ✓ bordering Euro country
- ✓ opt-in possibilities for other currencies/commodities

Gateway to a more ambitious initiative?



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MOTIVATION

■ **Political**

- ✓ EU Treaty, Internal Market

■ **Regulators**

- ✓ ECB Remote Access

■ **Business**

- ✓ EPC, EBF, Retailers



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The Cross-Border Community Licence

- **Granting authority: CoO**
- **Length: 3 years***
- **Conditions:**
 - ✓ national licence or 12 months* operations → *problem*
 - ✓ clean criminal records
 - ✓ training requirements (social partners)
 - ✓ language level
 - ✓ annual controls
- **Penalties by granting authority**
- **Scope of operations**
 - ✓ cabotage: intraday (0600-2200*) and including CoO → *problem*
 - ✓ point-to-point: intraday or more if permitted by national authorities



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Operational data

- ✓ Equipment: GPS + Com
- ✓ Applicable national rules: info to Police and cross pavement/delivery security

Means of operations

- ✓ IBNS with soft skin vehicles, unmarked, 2 non-armed personnel – if authorised by MS where the service is provided.
- ✓ Fully armoured with no IBNS – 3 armed crew (law permitting)
- ✓ Armoured (semi) with IBNS – 2 armed crew (law permitting)
- ✓ Coins: cabin armoured, 2 men crew and arms left up to MS
- ✓ Possibility of temporary special security measures



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Away from EU legalities, back to basic risk management principles and national realities

What is the threat?

- ✓ security of staff (non-uniformed personnel, non-armed trucks)
- ✓ risk displacement on new and softer targets
- ✓ double standards: the cross-border operator would be allowed to operate with lower security than provided by national rules
- ✓ unfair competition: a cross-border operator with lower security would take advantage of lower operating costs
- ✓ social issues

Need to limit this regulation to strict cross-border operations excluding domestic activity either in country of origin or in hosted country to prevent circumvention of national rules imposed to licensed domestic CIT operators.



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What is the opportunity?

- ✓ re-deployment of cash centres based on pure logistics rationale
- ✓ global approach? (European Templates?)
- ✓ convergence of national CIT standards?

How realistic is it?



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Possible trade-off

- ✓ What about Art. 38 of the Services Directive if the CIT Regulation goes through?

The Industry has the right to know!



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Industry Roadmap

- ✓ Discussion with UNI EUROPA
- ✓ Meetings with the Commission and participation to impact assessment
- ✓ If needed, communicate with MPs, Council and National Authorities

Timeline

- ✓ 2nd quarter of 2009: communication document and final draft
- ✓ 2nd quarter of 2009: consultations (EU Com + MS)
- ✓ End of 2009: Commission proposal & impact assessment
- ✓ 2010+: Consultation EP and negotiations with Council, vote (majority rules)
- ✓ Effective: a Regulation is binding as soon as ratified and published



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Thank you!

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