

Mr Philip Tod,
Head of Unit ECFIN C5
European Commission
200, Rue de la Loi,
1049 Brussels

By email

Brussels, 6 February 2025

Dear Mr Tod,

Re: follow up of our meeting of 4.02.2025

Once again thank you for your time and flexibility to meet us while we were in Brussels on February 4th. We found the meeting very helpful in clarifying a number of important points concerning the study on CIT that the Commission has initiated.

First, as we have stated many times since the inception of Regulation 1214/2011, there is very little demand for cross-border CIT from our customers, and no changes in the Regulation, whether its definitions or other aspects, will be able to change that, particularly in a context of continuously decreasing cash volumes. As a consequence, if the intention of the Commission is to increase cross-border CIT, we feel that changing the Regulation will not achieve this goal.

You asked what kind of efficiency gains the CIT companies could hope for from amending the Regulation, and the response given was “almost none”. Since cross-border is a marginal part of our operations, efficiency gains resulting from changes in the Regulation, if any, would be marginal too.

We would like to emphasise that the absence of cross-border licenses or declared CIT operations between neighbouring countries, as noted in the Terms of Reference of the study (section 3.1.2.3, page 10), should not be misinterpreted. As explained, it is a common practice to change crews and trucks at the border in order to complete any cross-border transport with domestic crews on each part of the journey, under domestic licences and without any breach of the EU cross border rules.

We reiterate our request for ESTA to be invited to join, as experts and representatives of the CIT industry, the forthcoming CIT-Committee meeting with the consultant.

As we discussed, domestic regulations reflect the crime situation in each country, and our crews are trained and equipped to address it, and this is not suited to the situation in other countries. There is indeed no such thing as a “single CIT market”.

As we mentioned during the meeting, the way the Eurosystem is shaped makes cash handling efficient and accessible to market operators at national level. As said, there is a very limited demand for cross-border cash transport. We note that in addition, no one, whether our customers, central banks or CIT operators themselves have expressed the need, let alone their

desire, to modify the Regulation. We also commented that the system itself, as managed by central banks and the Eurosystem, is very efficient in a way which allows to dispense from cross-border transport, which is moreover less cost efficient than domestic transport.

Therefore, the rationale for the current initiative is not clear, particularly as, as we expressed in our letter of 12 December 2024, the two previous Article 26 implementation reports did not identify any single reason for changing the Regulation. We are therefore questioning the use of Commission resources in this instance.

You mentioned that the Commission will make public a report of our meeting under the Transparency Regulation and this is, of course, perfectly fine by us. We appreciate that you have no intention in consulting us in drafting this report, other than sharing it once done and public. We would therefore be pleased if, as an extension of the transparency purposes that are the objectives of the Regulation, you could attach this letter to your meeting report.

Yours sincerely,

Guillaume Nonain
President

Thierry Lebeaux
Secretary general

Cc:

Dr Rüdiger Voss
Ms Irina Stoicescu
Mr Gonzalo Suarez