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Subject:	ANNEXES to the REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL on the implementation of Regulation (EU) No 1214/2011 of the European Parliament and of the Council of 16 November 2011 on the professional cross-border transport of euro cash by road between euro-area Member States pursuant to article 26 of this Regulation

Delegations will find attached document COM(2022) 295 final.

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Brussels, 22.6.2022
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ANNEXES 1 to 2

ANNEXES

to the

REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL

**on the implementation of Regulation (EU) No 1214/2011 of the European Parliament
and of the Council of 16 November 2011 on the professional cross-border transport of
euro cash by road between euro-area Member States pursuant to article 26 of this
Regulation**

ANNEX I

Questionnaire addressed to euro-area Member States on the implementation of Regulation (EU) No 1214/2011

- 1)** Have you encountered any difficulties in checking the criteria that CIT companies have to fulfil in order to be granted a CIT cross-border licence? Did those difficulties lead to any licence refusals?
- 2)** After having granted a CIT cross-border licence to a CIT company, have you ever been notified about the start of its cross-border activity?
- 3)** Have you ever been notified through information from another euro-area Member State about a CIT company from that MS preparing to carry out a CIT cross-border activity in your country?
- 4)** Do you think five years is an appropriate period of validity (as it stands today) for the CIT cross-border licences? If not, what would the appropriate period be?
- 5)** Do you think CIT cross-border licences should be granted on a group basis (several companies belonging to the same holding being granted 1 licence as a group)? Why?
- 6)** Do you think common training requirements on carrying weapons (see general rules on weapons in Article 6 of the Regulation) would be needed to make cross-border CIT more efficient? Why?
- 7)** Some aspects of professional cross-border transportation of euro cash by road are excluded from the CIT licence, e.g. cross-border transportation in the event only a minority of the pick-ups or deliveries is carried out in the host country (see Article 1 (b) of the Regulation). For this type of cross-border transportation only the law of the host country would apply and CIT companies would need a national licence from this country.
 - a)** Can you quantify how much professional cross-border transportation of euro cash not falling in the ambit of the CIT Regulation is carried out in your country?
 - b)** Do you think that the CIT licence should be broadened to cover also (certain types) of professional cross-border CIT in the euro area which are not falling in the ambit of the current CIT Regulation?¹ Which ones? Why?
- 8)** Have you put appropriate procedures in place to get a better overview on cross-border CIT transport taking place on your territory? Which procedures? If so, have these procedures led to an increase in the quality of data regarding cross-border CIT transport taking place on your territory?

¹ According to the Regulation the following type of cross-border CIT is covered: professional transport of euro cash by road, either for remuneration on behalf of third parties or carried out within a cash-in-transit (hereinafter 'CIT') company, between 6 a.m. and 10 p.m. by a CIT vehicle by road of euro banknotes or coins from a participating Member State, for supplying euro banknotes or coins to, or collecting them from, one or more locations in one or more other participating Member States, and in the Member State of origin – without prejudice to the transport of a maximum of 20 % of non-euro cash in relation to the total value of cash transported in the same CIT vehicle – where the majority of euro cash deliveries/pick-ups made by a CIT vehicle during the same day is carried out on the territory of the host Member State, or, in the case of point-to-point transport, where the transport takes place between two different participating Member States.

9) Do you know how much professional cross-border transportation of euro cash falling within the ambit of the CIT Regulation is carried out in your country annually (number of companies operating in your country, number of transportation, destinations, etc. ...)?

10) Have you carried out an information campaign targeting the cash demand side (banks, supermarkets, retailers) and CIT companies to make more use of cross-border CIT licences in general, and of matching transport arrangements in particular?

11) Further to the last review Member States were invited to apply a wider range of applicable transport arrangements provided for by Regulation (EU) No 1214/2011 on their territory to enhance the potential of cross-border CIT transport under the Regulation. Have you done so? If not, why?

12) The last review suggested to possibly consider the introduction of the Member State of origin principle for transport arrangements to better use the potential of cross-border CIT transport². Do you think that, if such a principle were to be applied, the demand for the cross border CIT licence and the number of cross-border CIT transports would increase in practice?

13) Do you think that the homologation or certification of IBNS systems should be further streamlined, i.e. through a uniform IBNS certification valid for the entire euro area?

14) Are there any other observations you would like to make?

² In this case, a CIT company licenced in its participating Member State of origin would be in a position to use its CIT vehicle for cross-border CIT transports to the host country following one of the transport arrangements provided for in Regulation (EU) No 1214/2011, without prejudice to the national firearms rules applying to the participating Member States.

**Questionnaire to companies with a licence for cross-border transportation of euro cash
by road (companies registered in the Internal Market Information System)
on their experience and for suggestions**

- 1) Why did you apply for a cross-border licence?(e.g. concrete business opportunities in the host country, favourable legal conditions applying in the host country, location / logistics etc.)?
- 2) Have you been able to easily provide the information and documents necessary for the competent authority to grant you the licence?
 - a) Are you using the cross border licence? How often?
 - b) To which euro-area Member States do you transport euro cash?
 - c) If you have not used the licence yet, what were the reasons (e.g. no cross-border market/demand, rules on the use of weapons in the host country, transport arrangements, language requirements, minimum wage, daytime requirement, any other)?
- 3) When carrying out cross border transportation, did you encounter any difficulties to abide by the rules applying in the neighbouring country (e.g. weapon licences, police rules ...)?
- 4) Do you think five years is an appropriate period of validity for the cross border licence? If not, what would be the appropriate period?
- 5) If you are part of a holding operating in several Member States: do you think it would be easier that Union cross-border licences are granted on a group basis? Why?
- 6) Have you used an Intelligent Banknote Neutralization System ('IBNS', e.g. staining devices) while carrying out cross-border transportation of euro cash? Would you use it even if were not mandatory (in your home and host country)?
- 7) Some types of professional cross-border transportation of euro cash by road are excluded from the licence.

Example 1: euro cash transportation to or from the host country if the transportation represents only a minority of the pick-ups or deliveries during the work shift.

Example 2: euro cash pick-up or delivery in the host country if during the transportation more than 20% of cash other than euro banknotes and coins is transported in parallel.

In these cases only the law of the host country would apply. CIT companies would need a national licence from this country and must follow national rules related thereto.

- a) Would you make more use of your cross-border CIT licence if the rule that the majority of cash deliveries or pick-ups are to be carried out in the host Member State were lifted?
- b) Would you expect to make more use of your cross-border CIT licence if limitation that non-euro cash transported in the CIT vehicle must not be more than 20% in relation to the total value of cash transported in the same CIT vehicle would be dropped?

- c)** Would you expect to make more use of your cross-border CIT licence if the specifications and features of your CIT vehicle as accepted in your country of origin were automatically accepted in the host country for the cross-border CIT transportation?³
- d)** Do you think that the licence as granted under the current Regulation should be broadened otherwise to cover also certain other types of professional cross-border transportation of euro cash in the euro area⁴? Which activities? Why?
- 8)** If you have undertaken any recent ‘greening’ measures in order to make your CIT transports more ecologically friendly (i.e. eco-friendly drives with zero-emission trucks, lighter vehicles equipped with IBNS technology, optimized packaging system based on returnable cash boxes): Have you experienced or would you expect that these measures enhance cross-border transportation opportunities? Why?
- 9)** Are there any other observations you would like to make?

³ For example, if your country of origin allows for the transport of banknotes in an unarmoured CIT vehicle of ordinary appearance equipped with IBNS, you could perform a cross-border cash transport to another host country using this transport arrangement, regardless of whether this transport arrangement is applicable in that country. However, this would be without prejudice to the national firearms rules applying to the participating Member States.

⁴ The current Regulation covers the follow transportation : professional transport of euro cash by road, either for remuneration on behalf of third parties or carried out within a cash-in-transit (hereinafter ‘CIT’) company, between 6 a.m. and 10 p.m. by a CIT vehicle by road of euro banknotes or coins from a participating Member State, for supplying euro banknotes or coins to, or collecting them from, one or more locations in one or more other participating Member States, and in the Member State of origin – without prejudice to the transport of a maximum of 20 % of non-euro cash in relation to the total value of cash transported in the same CIT vehicle – where the majority of euro cash deliveries/pick-ups made by a CIT vehicle during the same day is carried out on the territory of the host Member State, or, in the case of point-to-point transport, where the transport takes place between two different participating Member States.

Questionnaire addressed to ESTA
on the implementation of Regulation (EU) No 1214/2011

- 1) Do you know how much professional cross-border transportation of euro cash falling within the ambit of the CIT Regulation is carried out by your members to or from the country where they are established (number of transportations, destinations, value transported, type of vehicle armouring, number of CIT staff on board etc. ...)? How much is it compared to local/national CIT carried out by your companies? How would you explain the proportion between local/national and cross-border CIT?
- 2) What are the objective circumstances (if there are any) that justify in your view that professional transportation of euro cash by road is subject to both a CIT licence in the host country and national rules rather than subject to a European licence under the CIT-Regulation if less than half of the total value transported in a day shift (home and host country together) is transported in the host country?
- 3) What are the objective circumstances (if there are any) that justify in your view that professional transportation of euro cash by road in a host country is subject to both a CIT licence in the host country and national rules rather than subject to a European licence under the CIT-Regulation if more than 20 % of the total value of cash transported in the same CIT vehicle is non-euro cash?
- 4) The introduction of the Member State of origin principle for transport arrangements could possibly help to make better use the potential of cross-border CIT transportation⁵. Do you think that, if such a principle leading to more flexibility on the supply side were to be applied, the number of cross-border CIT licences and the number of cross-border CIT transports would increase in practice? Would more cross-border CIT create more benefits on the supply and demand side in terms of business opportunities and costs? Why?
- 5) Are there any other observations you would like to make on the CIT-Regulation?

⁵ In this case, a CIT company licenced in its participating Member State of origin would be in a position to use its CIT vehicle for cross-border CIT transports to the host country following one of the transport arrangements provided for in Regulation (EU) No 1214/2011, without prejudice to the national firearms rules applying to the participating Member States.

**Questionnaire addressed to ETUC
on the implementation of Regulation (EU) No 1214/2011**

- 1) Are the requirements for CIT security staff provided for in Article 5 (1) (c) on the minimum requirements for training on cross-border CIT appropriate? Please comment further as appropriate.
- 2) Has CIT security staff carrying out cross-border transportation in accordance with the CIT-Regulation experienced difficulties with being granted the relevant minimum rates of pay including overtime rates in the host Member State? How were problems encountered solved? Please comment further as appropriate.
- 3) Do you think five years is an appropriate period of validity (as it stands today) for the CIT cross-border licences? If not, what would the appropriate period be?
- 4) Do you think CIT cross-border licences should be granted on a group basis (several companies belonging to the same holding being granted 1 licence as a group)? Why?
- 5) Do you think common training requirements on carrying weapons (see general rules on weapons in Article 6 of the Regulation) would be needed to make cross-border CIT more efficient? Why?
- 6) Some aspects of professional cross-border transportation of euro cash by road are excluded from the CIT licence, e.g. cross-border transportation in the event only a minority of the pick-ups or deliveries is carried out in the host country (see Article 1 (b) of the Regulation). For this type of cross-border transportation only the law of the host country would apply and CIT companies would need a national licence from this country.
 - a) Can you quantify how much professional cross-border transportation of euro cash not falling in the ambit of the CIT Regulation is carried out by the CIT companies?
 - b) Do you think that the CIT licence should be broadened to cover also (certain types) of professional cross-border CIT in the euro area which are not falling in the ambit of the current CIT Regulation?⁶ Which ones? Why?
- 7) Do you know how much professional cross-border transportation of euro cash falling within the ambit of the CIT Regulation is carried out to or from your country annually from CIT companies established in your country (number of companies operating in your country, number of transportation, destinations, etc. ...)? How much is it compared to local/national CIT?
- 8) Further to the last review Member States were invited to apply a wider range of applicable transport arrangements provided for by Regulation (EU) No 1214/2011 on their territory to

⁶ According to the Regulation the following type of cross-border CIT is covered: professional transport of euro cash by road, either for remuneration on behalf of third parties or carried out within a cash-in-transit (hereinafter 'CIT') company, between 6 a.m. and 10 p.m. by a CIT vehicle by road of euro banknotes or coins from a participating Member State, for supplying euro banknotes or coins to, or collecting them from, one or more locations in one or more other participating Member States, and in the Member State of origin – without prejudice to the transport of a maximum of 20 % of non-euro cash in relation to the total value of cash transported in the same CIT vehicle – where the majority of euro cash deliveries/pick-ups made by a CIT vehicle during the same day is carried out on the territory of the host Member State, or, in the case of point-to-point transport, where the transport takes place between two different participating Member States.

enhance the potential of cross-border CIT transport under the Regulation. Are you aware of any such arrangements applied by Member States, and of their effectiveness?

9) The last review suggested to possibly consider the introduction of the Member State of origin principle for transport arrangements to better use the potential of cross-border CIT transport⁷. Do you think that, if such a principle were to be applied, the demand for the cross border CIT licence and the number of cross-border CIT transports would increase in practice?

10) Do you think that the homologation or certification of IBNS systems should be further streamlined, i.e. through a uniform IBNS certification valid for the entire euro area?

11) Are there any other observations you would like to make?

⁷ In this case, a CIT company licenced in its participating Member State of origin would be in a position to use its CIT vehicle for cross-border CIT transports to the host country following one of the transport arrangements provided for in Regulation (EU) No 1214/2011, without prejudice to the national firearms rules applying to the participating Member States.

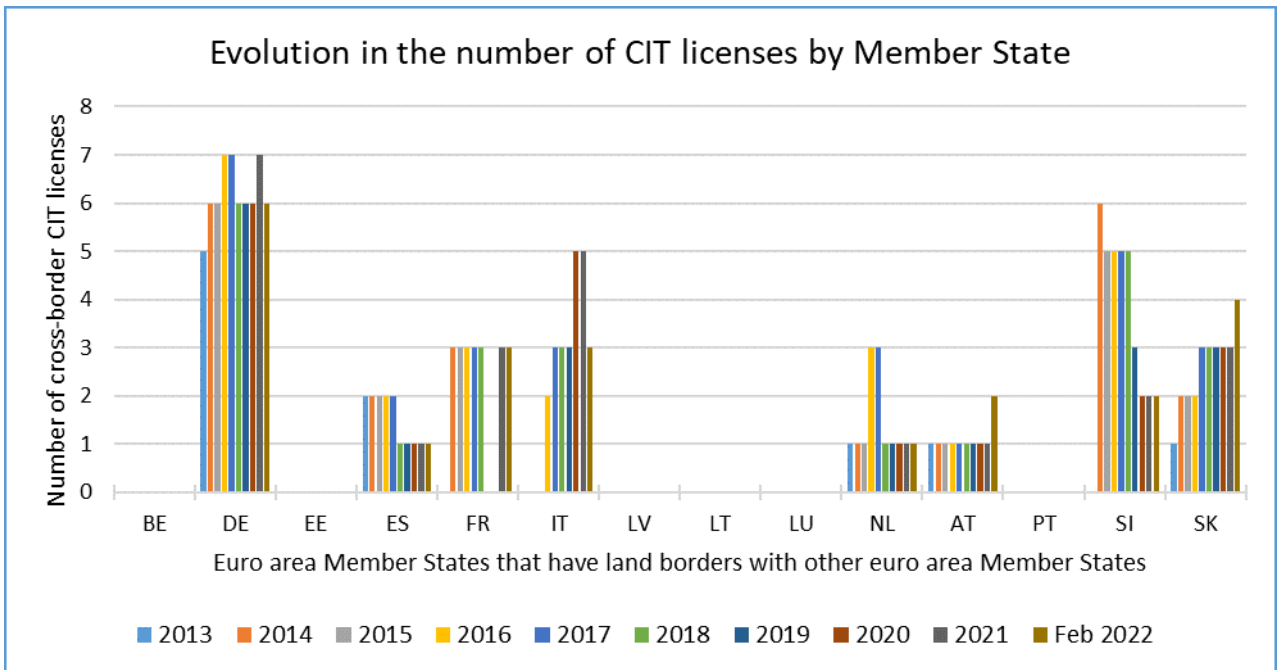
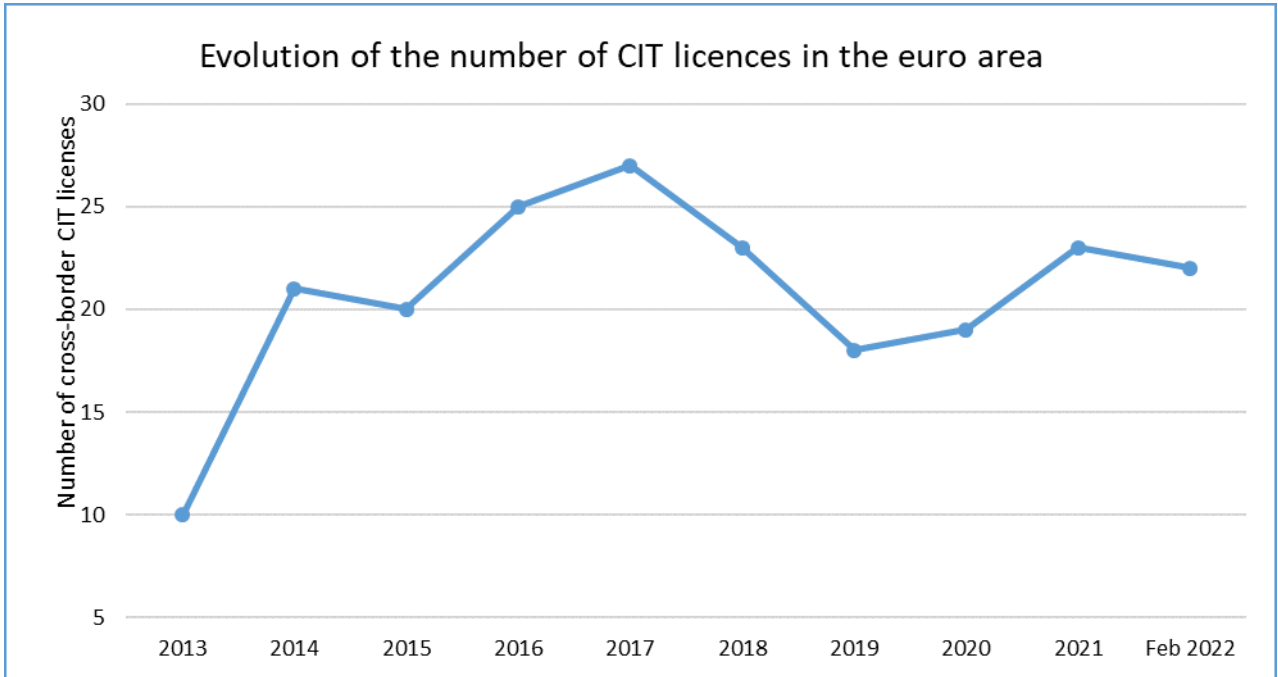
**Questionnaire addressed to EURICPA
on the implementation of Regulation (EU) No 1214/2011**

- 1)** Have you experienced substantial obstacles in providing IBNS for cross-border CIT (e.g. because of national rules, special certification procedures etc.)? How were those obstacles solved?
- 2)** Do you think that the homologation or certification of IBNS systems for cross-border CIT should be further streamlined, i.e. through a uniform IBNS certification valid for the entire euro area? Why? What would it mean in terms of business opportunities and costs?
- 3)** Which intelligent banknote neutralization technology (ink, glue, other) would you expect to dominate the market in the next 10 years? Why? What would be its role for cross-border CIT in the future?
- 4)** Are there any other observations you would like to make on the CIT-Regulation and on the role of IBNS?

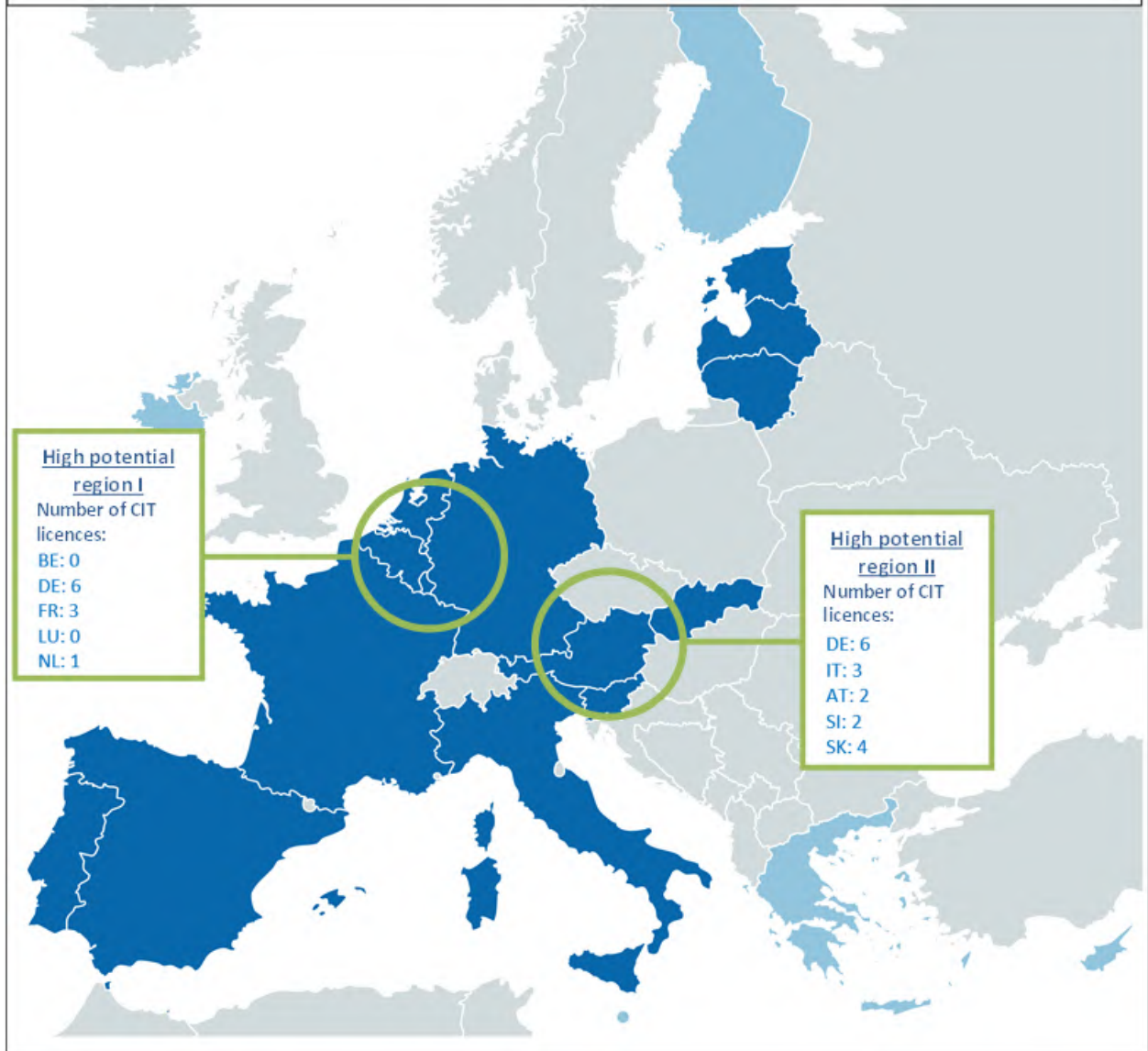
**Questionnaire addressed to Eurocommerce
on the implementation of Regulation (EU) No 1214/2011**

- 1.** Can you quantify how much professional transportation of euro cash by road your members request to cash-in-tranist (CIT) companies from an euro area country other than that one where your member is operating (Example: A German CIT company provides euro cash services to a supermarket in the Netherlands. The supermarket is your member. The CIT company operates cross-border in the host country which is the client's home country)? How much is this compared to transportation of euro cash your members request from locally or nationally operating CIT companies?
- 2.** Have your members experienced major obstacles in receiving such transportation services cross-border compared to the situation where the transportation was carried by a CIT company established in the client's home country? Which ones? How were they solved?
- 3.** For which reasons do your members request a CIT company established in a neighbouring euro-area Member State rather than a CIT company established in the client's country to transport euro cash to or from the member's location (e.g. shorter distances, better logistics, transport conditions, price advantage, service quality etc.)?
- 4.** What would have to change in your members' view in order to increase their demand for more cross-border rather than national transportation of euro cash to or from the members' location?
- 5.** Are there any other observations you would like to make on the professional transportation of euro cash by road from a client's point of view?

ANNEX II



CROSS-BORDER TRANSPORTATION OF EURO CASH BY ROAD IN THE EURO AREA



February 2022