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WORKING DOCUMENT

From:	Presidency
To:	Working Party on Financial Services and the Banking Union (Digital Euro Package) Financial Services Attachés
Subject:	Digital euro - WP meeting on 8 December 2025 - Presidency note on interoperability

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Presidency discussion note on interoperability

Working Party on Financial Services and the Banking Union

8 December 2025

Regulation on the establishment of the digital euro

Meeting on 8 December 2025

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1. Introduction

Interoperability is a key requirement for the effective functioning of the digital euro across the euro area. It concerns both the technical compatibility of systems and the broader frameworks that ensure smooth interaction with existing payment infrastructures. Ensuring a coherent and predictable approach to interoperability supports efficiency, competition and the integrity of the payment's ecosystem.

The objective of this note is to present targeted drafting adjustments to Articles 21 and 26, reflecting Member States' comments to the topic.

2. Cross-currency payments and interoperability

2.1 Article 21 – cross-border payments

At the Council Working Party (CWP) meeting in September 2025, Member States broadly supported the Presidency's proposal to clarify the scope of cooperation between the ECB and national central banks of Member States whose currency is not the euro. Delegations agreed that such cooperation should relate exclusively to matters linked to the respective national currencies of those Member States.

The Presidency recalls that some delegations suggested reinstating the previous wording of Article 21(2), while others underlined that the ECB should not be obliged to engage in cooperation where it does not consider it appropriate, and that the scope should remain strictly within the limits established by the Treaties.

In light of these comments, the Presidency proposes refining the provision to clarify that cooperation should take place where appropriate and must remain fully aligned with the Treaty, without extending the scope of the ECB's responsibilities.

2.2 Article 26 - Interoperability

The Presidency recalls that discussions at CWP's to date have shown broad support among Member States for maintaining the overall level of ambition regarding interoperability. Several delegations, however, underlined the need to avoid overly open-ended language and emphasised that the ECB should be clearly expected to work towards interoperability, while retaining the necessary degree of flexibility.

Against this background, the Presidency proposes refining Article 26 to clarify that **the ECB should ensure interoperability to the extent possible, with efforts focused on relevant standards, and supported, where appropriate, by the use of open standards**. The Presidency considers that this approach maintains flexibility, safeguards strategic

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autonomy, and avoids implying an obligation to deliver outcomes dependent on third-party systems.

Furthermore, the Presidency notes that several Member States called for clarifying that the ECB should work towards ensuring interoperability as well as maximising the extent to which market stakeholders are able to re-use their existing hardware and infrastructure. Therefore, the Presidency proposes to clarify in recital 59 that the use of open standards, common rules and processes, and **shared payment infrastructures of payment service providers and merchants, such as payment terminals, should support such compatibility**.

As regards the timing of the publication of technical standards, several Member States stressed the importance of early availability to allow payment service providers sufficient time to prepare and implement the necessary adjustments. To reflect this, the Presidency proposes **clarifying in the recitals that the ECB should publish the relevant technical standards as early as possible**.

Furthermore, the Presidency recalls the importance of continued engagement with stakeholders throughout the development of the digital euro and its rulebook, ensuring broad market input and supporting effective adoption. The Presidency therefore proposes introducing recital wording to clarify **that the ECB should take into consideration the views of all relevant stakeholders, including payment service providers, merchants and consumers, through appropriate consultative mechanisms**.

Questions 1-2 to Member States:

Q1. *Do Member States agree with the Presidency's proposed drafting suggestions to Article 21?*

Q2. *Do Member States agree with the Presidency's proposed drafting suggestions to recitals 10 and 59, and Article 26?*

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Drafting suggestions

New DK PCY drafting suggestions in green

Recital 10:

[…]In addition, within the framework of this Regulation and its delegated acts, the European Central Bank may adopt detailed measures, rules and standards pursuant to its own competences. **For the purpose of adopting such detailed measures, rules and standards, or amendments to such measures, rules and standards, the European Central Bank should take into consideration views of all relevant stakeholders in the framework of this Regulation, including payment service providers, merchants and consumers, through appropriate consultative mechanisms**. Where such measures, rules and standards have an impact on the protection of individual's rights and freedoms with regard to the processing of personal data, the European Central Bank should consult the European Data Protection Supervisor.

Recital 59:

To facilitate a harmonised user experience, the digital euro rules, standards and processes that the European Central Bank may adopt pursuant to its own competences, should ensure that any digital euro user is able to carry out digital euro payment transactions with any other digital euro users across the euro area regardless of the payment service providers involved and the **digital euro user interfaces ~~front-end services solutions~~** used. To reduce the fragmentation of the European retail payments market, and to support competition, efficiency and innovation in that market, and the development of payment instruments across the Union in keeping with the objective of the Commission's retail payment strategy, the digital euro should be, to the extent possible, compatible with private digital payment solutions, building on functional and technical synergies. In particular, the European Central Bank should **~~seek to~~** ensure, **to the extent possible**, that the digital euro is compatible with private digital payment solutions at the point of interaction, **which includes point-of-sale, e-commerce, m-commerce, as well as payees'environments that may cater for developments of future retails payments,** and in person-to-person payments, where the fragmentation of the Union retail payments market is currently significant. The use of open standards, common rules and processes, and possibly shared **payment** infrastructures **of payment services providers and merchants such as payment terminals, ~~could~~ should** support such compatibility. While existing solutions may be leveraged where such solutions are deemed appropriate to ensure that compatibility, notably in view of minimising overall adaptation costs, **the European Central Bank should ensure that relevant technical standards for the digital euro will be published well in advance of the issuance of the digital euro in order to allow for sufficient time for adopting the new standards by market operators and private solutions. However,** such existing solutions should not create undue dependencies that could prevent adaptation of the digital euro to new technologies or would be incompatible with the digital euro features. In order to achieve these objectives, and

without conferring any enforceable rights upon market operators, the European Central Bank should ~~seek to~~ ensure, **to the extent possible,** that the digital euro is compatible with private digital payment solutions on a best-effort basis and where deemed appropriate.

Article 21 - Cross-currency payments

1. […]

2. The European Central Bank ~~**may,**~~ **shall in accordance with the Treaties and where appropriate,** cooperate with national central banks of Member States whose currency is not the euro to enable interoperable payments between the digital euro and ~~**other**~~ **their** currencies.

Article 26 – Interoperability

The European Central Bank shall ~~**seek to**~~ ensure to the extent possible the interoperability of standards governing digital euro payment services with relevant standards governing private digital means of payment. The European Central Bank shall ~~**seek to**~~ enable, to the extent possible and where appropriate, private digital means of payment to use rules, standards and processes governing the digital euro payment services.

For the purpose of the first subparagraph, interoperability ~~**may**~~ **shall** be supported inter alia by the use of open standards.