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LIMITE

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WORKING DOCUMENT

From:	Estonian, Finnish, Latvian and Lithuanian delegations
To:	Working Party on Financial Services and the Banking Union (Digital Euro Package) Financial Services Attachés
Subject:	Digital euro package - WP on 31 January 2025 - Questionnaire accompanying the Non-paper by Estonia, Finland, Latvia and Lithuania: Strengthening resilience and preparedness of European retail payment landscape by digital euro

Questionnaire Accompanying the Non-paper by Estonia, Finland, Latvia and Lithuania: Strengthening resilience and preparedness of European retail payment landscape by digital euro

Questions: round 1

OBJECTIVES OF THE DIGITAL EURO PROPOSAL

RESILIENCE

Q1 Do you agree with the statement presented in the non-paper that resilience aspects should be better reflected in the legal text of the Digital Euro Regulation (see recitals 3,5,16 and 76b)?

Questions: round 2

DEFINITION OF EXCEPTIONAL CIRCUMSTANCES AND ACCEPTANCE OF DIGITAL EURO

Q2 Do MS agree that a definition for exceptional circumstances clarifies the situations where the proposed contingency measures can be activated (see Article 2)?

Q3 Do MS agree that in exceptional circumstances MS may have the discretion to extend the acceptance of digital euro beyond the regular users (eg. to merchant-to-merchant transactions) (see Article 9)?

LIMITS

Q4.1 Do you agree with the general principle in the non-paper where the holding limits could temporarily be increased or lifted in exceptional circumstances (see Article 16(2)(c) and recital 36)?

Q4.2 Do the Member States find that the process of lifting the limits temporarily in exceptional circumstances should be further defined in the legal text (see Article 16)?

Q4.3 Do Member States agree that transaction and holding limits for offline digital euro should also be sufficiently high for purchase of necessities during exceptional circumstances (see Article 37(6)(d))?

Questions: round 3

OTHER REMAINING PROPOSALS

Member State option to designate authority

Q5 Do Member States agree with the idea presented in the non-paper where Member States may designate authorities or other institutions to provide temporarily digital euro payments services in exceptional circumstances (see Article 14(3)(c))?

Emergency switching of digital euro payment accounts

Q6.1 Do Member States agree that the Member State may request the European Central Bank or national central bank to activate emergency switching of digital euro payment accounts in exceptional circumstances (see Article 31(2)(4))?

Q6.2. Do Member States agree that the Commission's empowerment to adopt delegated acts related to emergency switching is deleted (see Article 31(2)old(4))?

Q6.3 Do Member States agree that AMLA will develop guidelines specifying AML/CFT requirements for exceptional circumstances and emergency switching (see Article 14(5)(b))?

Front-end solutions to access and use the digital euro

Q7 Do Member States agree that to increase resilience the use of solutions independent from intermediating banks' digital channels (as sovereign payment instruments developed by the market and European Digital Identity Wallets) should be mentioned in the Regulation (see Articles 25(1) and 28(1))?

Other suggestions

Q8 Do you have any other suggestions that could strengthen the resilience of the digital euro aspects in any other parts of the Digital Euro Regulation (that were not mentioned in the paper)? If so, what are these suggestions?