

Brussels, 26 October 2026

## **EU Regulation on the Legal Tender of Euro Banknotes and Coins**

### **Public Transport Priorities for the Trilogue Negotiations**

UITP, the International Association of Public Transport, represents public transport operators and authorities providing daily mobility to European citizens. We recognise the importance of maintaining cash payments for vulnerable passengers and ensuring continuity of essential services during electronic payment disruptions. At the same time, considering that most customers use cash-less payment options, public transport operators are increasingly adopting digital payment solutions to improve accessibility, efficiency and passenger experience. As providers of essential public services, they must be able to balance financial inclusion with operational efficiency, safety and the continued development of modern payment systems.

In this context, UITP wishes to draw the attention of the European co-legislators to the following priorities, to ensure that the final regulation takes account of the specific operational needs of public transport.

#### **1. Maintain the exemption for unmanned points of sale**

UITP welcomes the exemption for unmanned points of sale, including ticket machines and other automated payment systems, reflected in the negotiating positions of the European Parliament and the Council. This exemption should be maintained in the final Regulation to avoid additional costs and unnecessary changes to existing ticketing systems.

#### **2. Allow cash payments at designated locations**

UITP is concerned that the proposed Regulation does not explicitly recognise the existing practice of accepting cash at certain designated sales points within public transport networks. In this regard, we support the Council position stating that Member States are able to restrict the EU rules for reasons of public interest (such as public transport). Without clear provisions and a reference to the public transport sector as example, the continuation of the sector's current arrangements would depend on the interpretation of the regulation, creating legal uncertainty for transport operators.

Many public transport networks accept cash at designated ticket offices, customer service centres or other authorised sales points, rather than at every station. This well-established practice ensures access to cash payments while avoiding unnecessary cash-handling arrangements across the network.

UITP calls on the EU co-legislators to explicitly recognise in the final regulation that cash acceptance requirements can be fulfilled through designated sales points within a public transport network, without requiring cash payments at every location.

### **3. Protect operational efficiency and staff safety**

In some cases, requiring staff in charge of ticket sales or ticket inspections to accept cash payments could expose them to security risks related to handling, carrying and transporting cash. Public transport operators should be allowed to restrict cash acceptance, where justified by operational or safety considerations, provided that passengers have access to appropriate alternative payment arrangements.

Last but not least, we would like to point out that payment methods in public transport are generally defined through standard conditions of carriage, making individual agreements with passengers impractical.

UITP calls on the EU co-legislators to **strike a balance between ensuring access to cash and preserving efficient, safe and modern public transport services**. In particular, the final regulation should maintain the exemption for unmanned points of sale and explicitly allow transport authorities and operators to restrict cash payments in public transport, while enabling cash transactions at designated, accessible locations, without requiring cash acceptance at every sales point.

This balanced approach would maintain access to public transport while safeguarding operational efficiency, staff safety, and the flexibility of public transport authorities and operators.

## **UITP Europe**