

# Minutes of the 21st meeting of the Retail Payments Council on 4 December 2025<sup>1</sup>

*The Retail Payments Council's twenty-first meeting took place on 4 December 2025, chaired by First Deputy Governor of the Riksbank Aino Bunge. At the meeting, the working groups appointed by the Retail Payments Council presented the work they had done since the previous plenary meeting.*

## Status report from the Committee on the accessibility of payment services

Since the last plenary meeting, the Committee has held two meetings. At these meetings, the Committee has worked on the mandate decided by the Council, which is to identify problems and analyse possible solutions for access to payment accounts. The mapping and conclusions have been summarised in a written document that was shared and presented to the Council (see separate annex).

The Committee notes that there is friction due to different objectives in the anti-money laundering regulations and the Payment Services Act. Technical conditions, processes and procedures for managing higher risk should therefore be ensured at the banks. A review of possible legislative changes or guidance should also not be excluded given the friction. Further, information on rights and obligations in relation to the access to payment accounts needs to be improved and the appeal process would benefit from being speeded up. Finally, it is noted that alternative means of payment will continue to be needed for people without a payment account.

## Status report of the Cash management committee

The Committee has held three meetings since the last plenary meeting, two of which focused on the operational disruptions that occurred at Bankomat AB after the company took over parts of its operations from Loomis AB. Committee members agreed to carry out a survey, the results of which were presented at the third meeting. The survey highlighted the importance of early coordination of information between relevant actors in the event of disruptions, transparency on the extent of disruptions, and building in preparedness for major changes to avoid widespread problems.

## Status report from the Committee for supervision and regulation

Since the last plenary meeting, the Committee has held two meetings. At one meeting, Card Payment Sweden presented a report on payment habits and preferences.

At the Committee's second meeting, the Swedish Post and Telecom Authority (PTS) presented a report on the supervision of access to cash services. In the report, PTS describes how market participants have provided sites to the extent required by the regulations, but that at the same time the regulations have not led to all the effects that the legislator sought when they were introduced. During the same meeting, a draft list of current legislative cases and initiatives, both at national and EU level, was presented. The list was also presented to the Council.

## Status report of the Committee on digitalisation and new services

The Committee has held three meetings since the last plenary session. At one meeting, they discussed instant payments. Finance Sweden, Handelsbanken, SEB and two members of the Swedish

---

<sup>1</sup> The members of the Retail Payments Council are Bankgirot, Card Payment Sweden, GetSwish AB, the Swedish Competition Authority, the County Administrative Board of Dalarna, the Swedish Civil Defence and Resilience Agency (formerly the Swedish Civil Contingencies Agency), the Swedish Post and Telecom Authority, the Riksbank, the Swedish Fintech Association, the Swedish Trade Federation, Finance Sweden, the Confederation of Swedish Enterprise and the Swedish Consumers' Association. The Ministry of Finance, Finansinspektionen and the Swedish National Debt Office participate as observers and are not involved in the Council's decision-making.

Fintech Association presented the way they work and how they manage risks related to instant payments

At the Committee's second meeting, Finansinspektionen (the financial supervisory authority) presented its work on implementing MICA in a Swedish context. At the committee's third meeting, PTS presented the work on the eIDAS Regulation and the digital identity wallet.

## Tour de table

**The Swedish Civil Defence and Resilience Agency** (until December 31 called the Swedish Civil Contingencies Agency) provided information on developments in the field of cybersecurity in response to the recommendations of the *Report on a strengthened national cybersecurity centre* (SOU 2025:79). According to these recommendations, the agency's cybersecurity-related elements should be transferred to the National Cybersecurity Centre at the Swedish Defence Radio Establishment.

**The Ministry of Finance** reported on the status of current regulatory cases.

**The Swedish Fintech Association** talked about Fintech Day.

**The County Administrative Board of Dalarna County** presented its monitoring report on access to basic payment services. The county administrative board assesses once again that the Riksdag (Swedish Parliament) objective of ensuring that everyone in society has access to basic payment services at reasonable prices, is not met for 2025. There are still significant gaps in access to basic payment services in Sweden, with older people and people with disabilities being particularly vulnerable.