Stripe position on a Proposal for a Regulation on the establishment of the digital euro

A digital euro could be a spur to innovation in the European single market, and lead to competition between payment methods. In order to carve out a distinctive role for the digital euro and ensure adoption, it will be important to create a digital currency and scheme that meet the needs of innovative businesses and the consumers of tomorrow.

Key considerations;

- All **PSPs should be able to distribute the digital euro** to merchants and consumers to ensure innovation and competition in the European payments landscape into the future. Stripe strongly supports the European Commission's proposal to **allow multiple digital euro payment accounts.**
- Functionality is key to the success of any payment method, and **recurring payments - fixed and variable** - should be enabled by the digital euro in addition to conditional payments to support innovative business models
- ECB to **work very swiftly to allow digital euro services to be provided for non-Euro area member states and third countries**
- Clarity is required in relation to the **fraud prevention and data privacy measures** proposed, including obligations on PSPs.
- **A market-driven pricing structure** will enable competition around the digital euro to ensure consumers and merchants can access the best value PSP / digital euro product available.
- Firms should also be permitted to **offer premium, value-added services** as part of the merchant service charge.

Introduction

Stripe provides an agnostic infrastructure layer that enables businesses to integrate seamlessly with over 125 global payment methods, offering customers a variety of preferred payment options. We believe that central bank digital currencies (CBDCs) could play an integral role in the future payment landscape, contributing to a diverse mix of payment methods. And a digital euro has the potential to create a unified set of payment rails across the EU, helping to overcome the current barriers to realizing the full potential of the European Digital Single Market.

Drawing from our experience integrating more than 125 payment methods, we believe that, if designed effectively, a digital euro could reduce payment costs for consumers and businesses, simplify cross-border transactions, and support innovative business models that deliver better services to consumers. Critical components of good payment methods are those that support business growth, higher productivity and global reach. Indeed, payments need to be seamless in their operation, easy to integrate and include the full suite of functionality that can support future business models, from recurring payments - fixed and variable - to easy fund flow management and the ability to manage disputes and refunds, fraud detection and prevention. They must also be reliable and secure as businesses depend on payment methods that ensure consistently high performance and availability with low latency, high conversion, and low fraud.

Should it be introduced, the digital euro would serve as a new, pan-European payment method with legal status, necessitating adoption by Stripe merchants operating in the Eurozone. Consequently, we urge legislators to design the digital euro with the functional needs of fast-growing innovative European businesses—such as e-commerce marketplaces, platforms, and subscription services—as well as those of larger enterprises in mind. Furthermore, the digital euro framework should accommodate participation from a diverse range of market players, including those beyond the traditional banking sector.

Below, we outline key considerations essential for defining a distinct role for the digital euro that meets the needs of both businesses and consumers, ensuring its widespread adoption. Ultimately, user satisfaction with the digital euro's functionality will be crucial in driving adoption and determining its overall success. We urge legislators to keep this principle front of mind in the development of final legislation.

Key Considerations

Multiple Wallets : Stripe strongly supports the European Commission's proposal to **allow multiple digital euro payment accounts (Article 2 (5)),** viewing it as essential for the success and adoption of the digital euro. On the other hand, limiting consumers to a single account would stifle innovation and competition, negatively affecting those who prefer multiple accounts for varying use cases. While acknowledging the complexities of allocating holding limits across accounts, Stripe emphasizes that a smooth user experience can still be achieved without requiring direct user intervention. Specifically, the end user could, in a single app, specify their target holdings in each of their PSPs. Once confirmed, the DESP (Digital Euro Service Provider) could orchestrate the defunding and limit-setting actions in the required order, with the end user being notified to confirm in each respective app. Importantly, the level of complexity is a decision of the User - allowing the consumer the option to host multiple accounts creates no imposition on those who chose to use just a single account. Additionally, while switching (Article 31) services for current accounts could be made available for digital euro accounts, switching alone does not suffice as a replacement for the option of multiple accounts.

PSP Obligations: Article 13 allows Payment Service Providers (PSPs) to offer digital euro services as listed in Annex 1 to businesses and consumers in the Euro Area but **flexibility in the choice of services to be offered** would be welcome to foster innovation and choice. Additionally, further details are needed for PSPs regarding their obligations concerning visitors' use of the digital euro, as well as clarifications on enforcing the 'time limitations' in Recital 21 and how the residency status for natural and legal persons would be enforced.

Conditional and Recurring Payments: Stripe welcomes the focus on operational aspects of digital euro accounts in the draft legislation, particularly the need for interoperable conditional digital euro payment transactions (Article 24), including the reservation of funds and cross-currency payments. A simple set of conditional building blocks in the central bank's infrastructure will foster private sector innovation in ‘conditional payments’. However, Stripe observes that it is crucial for the digital euro to accommodate **recurring payments—both fixed and variable— to support innovative business models and user needs** across the economy.

Holding Limits: Stripe understands the objective of the waterfall and reverse waterfall functionality and the objectives of the ECB in imposing holding limits. However, the net effect of this unique feature for consumers is that a single conventional transaction is turned into three transactions across two accounts - the original transaction, the funding transaction and the defunding transaction. In order to minimise this flurry of transactions Stripe suggests to **model holding limit adoption over multiple years and impose a per-capita holding limit high enough to allow for salary payments and regular outgoings** for a majority of users. The uptake of a digital euro by consumers is likely to be gradual, and this approach would enable the ECB to encourage adoption while providing it with the flexibility to make iterative changes to the holding limit as required. Notably for businesses, the **ECB suggests a zero balance limit for merchant wallets** however this is not specifically addressed in the draft legislation. Defined technical windows for defunding for merchants would help to ensure a smooth operation of their services. Moreover, it would be important that risk management processes can be adhered to. Automatic defunding to a linked bank account runs counter to risk management strategies, as in certain cases, imposing payout delays is a crucial lever in risk management.

Non-Euro area / third-country access : Stripe encourages **legislators and the ECB to work very swiftly to allow digital euro services to be provided for non-Euro area member states and third countries** as outlined in Article 18 and 19, in line with Euro area member states. This will ensure that merchants in non-euro area countries can receive digital euro payments from customers in the Euro area.

Fraud : Stripe emphasizes the need for **clear alignment between privacy obligations and financial crime objectives in fraud management and to ensure the rules put in place for the digital euro should not be highly divergent from other means of payment.** We welcome the proposed fraud detection and prevention mechanism in Article 32 but seek clarification on whether it replaces or supplements existing PSP mechanisms and what are the specific obligations for PSPs if a suspected fraudulent transaction is encountered. Furthermore, it is imperative that PSPs are encouraged to continue to build out their respective fraud prevention mechanisms.

Clarity is also required around the **operational requirements on PSPs in the context of offline payments,** particularly around data protection, fraud management, payment security and efficiency. Additionally, further detail is required around the proposed approach to dispute resolution as outlined in Recital 62 and Article 27, including clarity on what entity the final decision-making process rests with.

Finally, **transaction monitoring of a payment method** requires a unique payer identifier to support PSPs in detecting financial crimes, in compliance with regulatory requirements. All PSPs should be able to create such a UPI, not just PSPs distributing the digital euro. Additionally, in Article 37, it states that transaction data shall not be retained by payment service providers. This will impact PSPs ability to do transaction monitoring.

Data : Regarding data protection and privacy obligations, we welcome the emphasis across the text on the need for state-of-the-art security and privacy-preserving measures and alignment with GDPR. However, **there is a significant challenge in balancing user privacy with the need for financial security and regulatory compliance and more clarity is required. For example, the** restrictions for offline transactions would require a new technical framework operating with more prescriptive data minimization and purpose limitation, and potentially could limit PSPs ability to apply existing fraud prevention and transaction analysis techniques. Moreover, **Article 32 and Annex 5** appear to require PSPs to collect and share significant amounts of data, that may be in conflict with the principle of data minimisation. Article 34 outlines certain instances whereby PSPs would be joint controllers, and more clarity is required on what this would entail in practice. Finally, in Annex 3, it would be advisable to allow a broader definition / list, for other data elements that may need to be processed to achieve the objectives.

Fees : Stripe cautions that inadequate investment in the digital euro and a lack of ongoing incentives for issuers could adversely affect functionality and user experience. **Pricing for digital euro payments should therefore be market-driven to foster competition** and ensure consumers and merchants receive the best value and best digital euro product available. Additionally, PSPs should be permitted to offer **premium, value-added services as part of their fees to encourage market participation and enhance user experience.** For example, Stripe today offers a range of payments-adjacent software products, including a product called Stripe Radar which seeks to help identify and block payment fraud.

ANNEX : Stripe suggested amendments on the digital euro proposal

Variable Recurring Payments - recitals (4) (31) (57)	
Commission proposal	**Stripe proposal**
(4) To address the need of a rapidly digitalising economy, the digital euro should support a variety of use cases of retail payments. Those use case include person to person, person to business, person to government, business to person, business to business, business to government, government to person, government to business, and government to government	(4) To address the need of a rapidly digitalising economy, the digital euro should support a variety of use cases of retail payments. Those use cases include person to person, person to business, person to government, business to person, business to business, business to government, government to person, government to business, and government to government

payments. In addition, the digital euro should also be able to fulfil future payments needs, and in particular machine to machine payment in the context of Industry 4.0 and payments in the decentralised internet (web3). The digital euro should not cater for payments between financial intermediaries, payment service providers and other market participants (that is to say wholesale payments), for which settlement systems in central bank money exist and where the use of different technologies is being further investigated by the Eurosystem.	payments. In addition, the digital euro should also be able to fulfil future payments needs, **including variable recurring payments,** and in particular machine to machine payment in the context of Industry 4.0 and payments in the decentralised internet (web3). The digital euro should not cater for payments between financial intermediaries, payment service providers and other market participants (that is to say wholesale payments), for which settlement systems in central bank money exist and where the use of different technologies is being further investigated by the Eurosystem.
(30) To enable a wide usage of the digital euro and keep pace with innovation in digital payments, digital euro payment services should include basic and additional digital euro payment services. Basic digital euro payment services are payment, account or support services that are considered essential for the use of the digital euro by natural persons. This includes inter alia the provision of at least one payment instrument to natural persons. Only account servicing payment service providers under Directive 2015/2366 should provide the entire set of basic digital euro services. In addition to these basic digital euro payment services, account servicing payment service providers and other payment service providers under Directive 2015/2366 may develop and provide additional digital euro payment services. Additional digital euro payment services include for instance conditional digital euro payment transactions like payper-use, or payment initiation services. The digital euro infrastructure should facilitate the deployment of such optional services.	(30) To enable a wide usage of the digital euro and keep pace with innovation in digital payments, digital euro payment services should include basic and additional digital euro payment services. Basic digital euro payment services are payment, account or support services that are considered essential for the use of the digital euro by natural persons. This includes inter alia the provision of at least one payment instrument to natural persons. Only account servicing payment service providers under Directive 2015/2366 should provide the entire set of basic digital euro services. In addition to these basic digital euro payment services, account servicing payment service providers and other payment service providers under Directive 2015/2366 may develop and provide additional digital euro payment services. Additional digital euro payment services include for instance conditional digital euro payment transactions like payper-use, **variable recurring payments** or payment initiation services. The digital euro infrastructure should facilitate the deployment of such optional services.
(55) The digital euro should support the programming of conditional digital euro payment transactions by payment service providers. The digital euro should, however, not be "programmable money", which means units that, due to intrinsically defined spending conditions, can only be used for buying specific types of goods or services, or are subject to time limits after which they are no longer usable. Conditional payment transactions are payments which are automatically triggered by software based on predefined and agreed conditions. Conditional payments should not have, as object or effect, the use of digital euro as programmable money. Payment service providers could develop different	(55) The digital euro should support the programming of conditional digital euro payment transactions by payment service providers. The digital euro should, however, not be "programmable money", which means units that, due to intrinsically defined spending conditions, can only be used for buying specific types of goods or services, or are subject to time limits after which they are no longer usable. Conditional payment transactions are payments which are automatically triggered by software based on predefined and agreed conditions. Conditional payments should not have, as object or effect, the use of digital euro as programmable money. Payment service providers could develop different

types of logic to offer a range of conditional payment transactions to digital euro users, including automated payment transactions for placing or withdrawing digital euros, payment standing orders that trigger automatic payments of a specific amount on a specific date, and payments between machines where those machines are programmed to automatically trigger payments for their own spare parts upon ordering them, for charging and paying electricity at most favourable market conditions, for paying insurance, and leasing and maintenance fees on a usage basis.	types of logic to offer a range of conditional payment transactions to digital euro users, including automated payment transactions for placing or withdrawing digital euros, payment standing orders that trigger automatic payments of a specific **or variable** amount on a specific date, and payments between machines where those machines are programmed to automatically trigger payments for their own spare parts upon ordering them, for charging and paying electricity at most favourable market conditions, for paying insurance, and leasing and maintenance fees on a usage basis.
The Digital Euro should cater for the needs of the businesses and consumer of tomorrow, and include at the very least the ability to offer recurring payments in fixed and variable form. Usage based subscription models are increasingly popular and enable consumers to pay different amounts to the same provider without having to re-authenticate the payment each time.	

Merchant service charges - recital (24)	
Commission Proposal	**Stripe Proposal**
24. 'merchant service charge' means a fee paid by the payee to a payment service provider when acquiring a digital euro payment transaction;	24. 'merchant service charge' means a fee paid by the payee to a payment service provider when acquiring a digital euro payment transaction; **it can also be composed of charges for value added services.**
This amendment reflects that value-added services can be charged on top of digital euro. This will enable innovation in and around the digital euro payment method by private actors, in line with customer demands and needs.	

Limits on inter-PSP or merchant fees - recital (31)	
Commission Proposal	**Stripe Proposal**
(31) Pursuant to its powers under the Treaties and in line with the provisions of this Regulation, the European Central Bank should be able to set limits on the use of the digital euro as a store of value. The effective use of the digital euro as a legal tender means of payment should be preserved through limits on inter-PSP or merchant fees.	(31) Pursuant to its powers under the Treaties and in line with the provisions of this Regulation, the European Central Bank should be able to set limits on the use of the digital euro as a store of value. ~~The effective use of the digital euro as a legal tender means of payment should be preserved through limits on inter-PSP or merchant fees.~~
Stripe believes allowing the price to be set by market participants will ensure innovation by	

incumbents and emerging players wanting to provide the best possible digital euro product. This approach would incentivise the market to innovate and ensure consumers and merchants in Europe can choose the best offering available, and tailored to their needs.

Holding Limits - recital (36)	
Commission Proposal	**Stripe Proposal**
(36) The digital euro should allow for a smooth payment experience. Any instruments that the European Central Bank might employ to limit the digital euro's store of value function should take this objective into account. Automated mechanisms that link a digital euro payment account with a non-digital euro payment account should allow for an uninhibited payment functionality of the digital euro, by ensuring that transactions are successfully executed in the presence of individual digital euro holding limits that may become binding on the payer's or payee's side.	(36) The digital euro should allow for a smooth payment experience for natural and legal consumers. Any instruments that the European Central Bank might employ to limit the digital euro's store of value function should take this objective into account. **Specifically, holding limits for consumers should impose a per-capita holding limit high enough to allow for average salary payments and regular outgoings for a majority of users. Holding limits should also be modeled gradually to enable the ECB to encourage adoption while providing it with the flexibility to make iterative changes to the holding limit as required.**Automated mechanisms that link a digital euro payment account with a non-digital euro payment account should allow for an uninhibited payment functionality of the digital euro, by ensuring that transactions are successfully executed in the presence of individual digital euro holding limits that may become binding on the payer's or payee's side.
To minimise obstacles to adoption, Stripe suggests to **model holding limit adoption over multiple years and impose a per-capita holding limit high enough to allow for salary payments and regular outgoings** for a majority of users. The uptake of a digital euro by EU citizens is likely to be gradual, and this approach would enable the ECB to encourage adoption while providing it with the flexibility to make iterative changes to the holding limit as required.	

Acceptance of the digital euro outside of the Euro Area - recital (53)	
Commission Proposal	**Stripe Proposal**
(53) Agreements and arrangements related to the provision of digital euro payment services or cross-currency payments involving the digital euro should be concluded on a voluntary basis, in priority with non-euro area Member States. The European Central Bank should cooperate with	(53) Agreements and arrangements related to the provision of digital euro payment services or cross-currency payments involving the digital euro should be concluded on a voluntary basis. **Priority should be given to agreements** with non-euro area Member States, **to ensure**

national central banks of Member States whose currency is not the euro for the purpose of cross-currency payments involving the digital euro.	**merchants outside of the Euro area can offer the digital euro to their consumers in the Euro area.** The European Central Bank should cooperate with national central banks of Member States whose currency is not the euro for the purpose of cross-currency payments involving the digital euro.
Co-legislators should work swiftly to ensure merchants outside of the Euro area can offer the digital euro to their consumers in the Euro area, ideally at launch if not soon thereafter to ensure that consumers outside of the Euro area can choose to pay with digital euro.	

Article 2 Definitions	
Commission Proposal	**Stripe Proposal**
27. 'user identifier' means a unique identifier created by a payment service provider distributing the digital euro that unambiguously differentiates, for online digital euro purposes, digital euro users but that is not attributable to an identifiable natural or legal person by the European Central Bank and the national central banks;	27. 'user identifier' means a unique identifier created by a payment service provider ~~distributing the digital euro~~ that unambiguously differentiates, for online digital euro purposes, digital euro users but that is not attributable to an identifiable natural or legal person by the European Central Bank and the national central banks;
In compliance with regulatory requirements, transaction monitoring of a payment method requires a unique payer identifier to detect financial crimes. The creation of such an identifier, should be able to be facilitated by any PSP, not just a PSP distributing the digital euro.	

Article 13 Payment Service Providers	
Commission Proposal	**Stripe Proposal**
Within the framework of Directive 2015/2366, payment service providers may provide the digital euro payment services set out in Annex I to:	Within the framework of Directive 2015/2366, payment service providers may provide **one or more of** the digital euro payment services set out in Annex I to:
Article 13 allows Payment Service Providers to directly provide digital euro services listed in Annex 1. The amendment seeks to clarify that there is a level of flexibility in the choice of digital euro services a PSP can provide under Annex 1.	

Article 15 Principles	
Commission Proposal	**Stripe Proposal**
2. With a view to ensuring an effective use of the digital euro as a legal tender means of payment, and to avoiding excessive charges for merchants subject to the obligation to accept the digital euro under Chapter II while providing compensation for the relevant costs incurred by payment services providers for the provision of digital euro payments, the level of charges or fees to be paid by natural persons or merchants to payment service providers, or between payment service providers, shall be subject to limits.	With a view to ensuring an effective use of the digital euro as a legal tender means of payment, and to avoiding excessive charges for merchants subject to the obligation to accept the digital euro under Chapter II while providing compensation for the relevant costs incurred by payment services providers for the provision of digital euro payments, the level of charges or fees to be paid by natural persons or merchants to payment service providers, or between payment service providers, shall be **set by market participants** ~~subject to limits.~~
Stripe believes allowing the price to be set by market participants will ensure innovation by incumbents and emerging players wanting to provide the best possible digital euro product. This approach would incentivise the market to innovate and ensure consumers and merchants in Europe can choose the best offering available, and tailored to their needs.	

Article 17 Fees on digital euro payment services	
Commission Proposal	**Stripe Proposal**
1. For the purpose of Article 15(2), without prejudice to any possible fees charged on other digital euro payment services, payment services providers shall not charge fees to natural persons as referred to in Article 13(1), points (a), (b) and (c), for the provision of the basic digital euro payment services referred to in Annex 2. 2. For the purpose of Article 15(2), any merchant service charge or inter-PSP fee in relation to digital euro payment transactions shall comply with the principle of proportionality. Any merchant	1. For the purpose of Article 15(2), without prejudice to any possible fees charged on other digital euro payment services, payment services providers shall not charge fees to natural persons **acting as consumers** as referred to in Article 13(1), points (a), (b) and (c), for the provision of the basic digital euro payment services referred to in Annex 2. 2. For the purpose of Article 15(2), any merchant service charge or inter-PSP fee in relation to digital euro payment transactions shall **be set by the market**

service charge or inter-PSP fee shall not exceed the lowest of the following two amounts: (a) the relevant costs incurred by payment services providers for the provision of digital euro payments, including a reasonable margin of profit; (b) fees or charges requested for comparable digital means of payment.	participants and comply with the principle of proportionality. ~~Any merchant service charge or inter-PSP fee shall not exceed the lowest of the following two amounts:~~ ~~(a) the relevant costs incurred by payment services providers for the provision of digital euro payments, including a reasonable margin of profit;~~ ~~(b) fees or charges requested for comparable digital means of payment.~~
3. The European Central Bank shall regularly monitor the information that is relevant for the purposes of the amounts referred to in paragraph 2, and publish periodically the amounts resulting from that monitoring with an explanatory report.	3. The European Central Bank shall regularly monitor the information that is relevant for the purposes of the amounts referred to in paragraph 2, and publish periodically the amounts resulting from that monitoring with an explanatory report.
4. The European Central Bank may require payment service providers to provide all information necessary for the application of this Article and to verify compliance with it. Any information requested shall be sent by payment service providers within the time limit set by the European Central Bank. The European Central Bank may require that such information is certified by an independent auditor.	~~4. The European Central Bank may require payment service providers to provide all information necessary for the application of this Article and to verify compliance with it. Any information requested shall be sent by payment service providers within the time limit set by the European Central Bank. The European Central Bank may require that such information is certified by an independent auditor.~~
5. The methodology to be developed by the European Central Bank for the monitoring and the calculations of the amounts referred to in paragraphs 2 and 3 shall be based on the following parameters: (a) the amount of inter-PSP fees and merchant service charges as referred to in paragraph 2(a) shall be based on the relevant costs incurred for providing digital euro payment services by the most cost-efficient payment service providers representing collectively one fourth of digital euro distributed across the euro area in a given year, as reported	~~5. The methodology to be developed by the European Central Bank for the monitoring and the calculations of the amounts referred to in paragraphs 2 and 3 shall be based on the following parameters:~~ ~~(a) the amount of inter-PSP fees and merchant service charges as referred to in paragraph 2(a) shall be based on the relevant costs incurred for providing digital euro payment services by the most cost-efficient~~

to the European Central Bank by payment service providers, including a reasonable margin of profit; (b) the reasonable margin of profit included in the maximum amount referred to in paragraph 2(a), shall be calculated on the basis of the margin of profit of the payment service providers charging the lowest margin of profit representing collectively one fourth of the digital euro distributed in the euro area in a given year, as reported to the European Central Bank by payment service providers;of (c) the amount of inter-PSPs fees and merchant service charges as referred to in paragraph 2(b) shall be based on a representative group of payment services providers providing comparable digital means of payment in the euro area; (d) the amounts referred to in paragraph 2 shall be uniform and applied in a non-discriminatory manner across the euro area. 6. The merchant service charge shall be the only charge per transaction that payment service providers may apply to merchants. Payment service providers shall not charge merchants for the funding and defunding of the digital euro, including digital euro payment transactions referred to in Article 13(4). Payment service providers shall include costs associated with funding and defunding in the relevant costs referred to in paragraph 2(a). 7. No inter-PSP fee shall apply to the funding and defunding of the digital euro,	~~payment service providers representing collectively one fourth of digital euro distributed across the euro area in a given year, as reported to the European Central Bank by payment service providers, including a reasonable margin of profit;~~ ~~(b) the reasonable margin of profit included in the maximum amount referred to in paragraph 2(a), shall be calculated on the basis of the margin of profit of the payment service providers charging the lowest margin of profit representing collectively one fourth of the digital euro distributed in the euro area in a given year, as reported to the European Central Bank by payment service providers;of~~ ~~(c) the amount of inter-PSPs fees and merchant service charges as referred to in paragraph 2(b) shall be based on a representative group of payment services providers providing comparable digital means of payment in the euro area;~~ ~~(d) the amounts referred to in paragraph 2 shall be uniform and applied in a non-discriminatory manner across the euro area.~~ 6. ~~The merchant service charge shall be the only charge per transaction that payment service providers may apply to merchants.~~ Payment service providers shall not charge merchants for the funding and defunding of the digital euro, including digital euro payment transactions referred to in Article 13(4).

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<td>including digital euro payment transactions referred to in Article 13(4).</td>
<td>Payment service providers shall include costs associated with funding and defunding in the relevant costs referred to in paragraph 2(a). <u>The merchant service charge can also be composed of charges for value-added services.</u>

7. No inter-PSP fee shall apply to the funding and defunding of the digital euro, including digital euro payment transactions referred to in Article 13(4).</td>
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<tr>
<td colspan="2">Stripe believes allowing the price to be set by market participants will ensure innovation by incumbents and emerging players wanting to provide the best possible digital euro product. This approach would incentivise the market to innovate and ensure consumers and merchants in Europe can choose the best offering available, and tailored to their needs.

It is also essential that merchants are able to access a range of value-added services within the pricing structure for digital euro. Stripe for example includes payments-adjacent software products to merchants within its offering, e.g. in relation to fraud through a product called Radar. Radar ingests data including checkout flow data, rich payments data, and card network and bank information to assess fraud risk.

As currently drafted merchants would not be able to access such value-added services for the digital euro. Stripe proposes the above amendment, which clarifies that the merchant service charge can also be composed of charges for value-added services.</td>
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About Stripe

Stripe is building programmable financial services for millions of businesses globally. Millions of companies use Stripe to accept payments online and in person, embed financial services, power custom revenue models, and build a more profitable business.

Headquartered in San Francisco and Dublin, Stripe processes over $1.4 trillion of payments annually, equivalent to 1.3% of global GDP. Stripe users include half of the Fortune 100, 80% of the Forbes Cloud 100 and 74% of the Forbes AI 50. In the EU, Stripe is regulated by the Central Bank of Ireland as an Electronic Money Institution and provides merchant acquiring services as part of its suite of services across the EU via passporting.

Through its scale and investments in R&D—particularly artificial intelligence and stablecoins—Stripe accelerates the utility of frontier technology in the global economy.