ACCIE
Association of Credit Card Issuers Europe

ACCIE – Position on co-badging and the Digital Euro

The Association of Credit Card Issuers Europe (ACCIE) represents the specialised European credit card issuing industry to the European Union. ACCIE's mission is to ensure that cardholders across Europe gain optimal benefit from the credit card payment instruments offered by its members.

Executive summary

The Association of Credit Card Issuers in Europe (ACCIE) welcomes co-badging as a means of integrating the Digital Euro into the existing European payment ecosystem. Co-badging could enable consumers to access different payment solutions through familiar payment instruments, while allowing established card products to retain their existing role and functionality. For co-badging to deliver these benefits, however, its design should fully recognise the role and characteristics of established payment cards that consumers already know and trust. In particular, ACCIE would like to highlight the importance of including credit cards in the ongoing co-badging considerations.

ACCIE therefore encourages the co-legislators and the European Central Bank (ECB) to:

- **Include credit cards in the co-badging considerations,** recognising their established role and significant share of the payment card market.
- **Preserve consumer choice**, allowing consumers to continue to use established payment solutions alongside the Digital Euro.
- **Take established security and consumer protection practices into account**, supporting a secure and seamless payment experience.
- **Keep co-badging voluntary and consider the implications for issuers**, including the costs and responsibilities associated with participating in co-badging.

Including credit cards in the co-badging considerations

The current technical work on co-badging primarily focuses on debit cards[1]. While this is understandable given that the Digital Euro represents a debit payment method, ACCIE considers it important that credit cards are explicitly included in the ongoing considerations. Credit cards are an established part of the European payments ecosystem and account for a significant share of payment cards. They should therefore be considered alongside debit cards when assessing how co-badging could work in practice. This would help ensure that the emerging framework is sufficiently inclusive and enables co-badged cards to be offered to as many consumers as possible, rather than inadvertently excluding users of an established payment method.

Preserving consumer choice

Payment cards remain among the most widely accepted and trusted payment methods across Europe and are familiar to both European citizens and international visitors[2]. They provide consumers with

[1] ECB (2026). *Co-badging technical deep dive*. ERPB Fit in the Ecosystem Workstream.
[2] Payments Europe (2025). *Safety, Convenience and Choice: The True Value of Cards*.

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convenience, security and broad acceptance and, in the case of credit cards, access to credit and additional services and benefits.

The ECB and the European Retail Payments Board (ERPB) have rightly identified the potential benefits of co-badging with trusted brands, enabling consumers to access the Digital Euro through payment instruments with which they are already familiar, while retaining the possibility of choosing established private payment solutions[3]. ACCIE therefore supports co-badging as a means of complementing existing payment methods and preserving consumer choice. The co-legislators should ensure that the framework supports this potential and does not restrict the development of co-badging or consumers' continued access to existing payment solutions alongside the Digital Euro.

Safeguarding established security and consumer protection

Safety and security of transactions are fundamental requirements for consumers, merchants and payment service providers. Regarding these, payment cards enjoy the highest level of trust among consumers and merchants compared to other payment methods[4]. Therefore, the established security and consumer protection practices should be taken into account. The introduction of an additional payment solution should not unnecessarily complicate the payment experience or create uncertainty for consumers, merchants or issuers. Clear responsibilities for authentication, fraud prevention, liability and dispute handling will be important to maintain a secure and seamless payment experience.

Keeping co-badging voluntary and considering the implications for issuers

ACCIE believes that co-badging can provide significant benefits to consumers. However, as already recognised by the ERPB, co-badging also involves additional costs and considerations for issuers and should therefore remain voluntary[5]. No issuer should be required to offer co-badged products or to integrate the Digital Euro into an existing payment card. Where issuers choose to offer co-badged products, appropriate compensation is needed for the services, investments, risks and responsibilities involved. This includes a framework that avoids creating incentives to shift transactions from existing payment solutions to the Digital Euro without appropriately recognising the costs incurred by the issuers of the co-badged payment card.

Conclusion

Co-badging can offer a practical way to integrate the Digital Euro into the existing payments ecosystem while preserving consumer choice and the benefits of established payment solutions. For co-badging to work effectively, the diversity of existing payment methods should be appropriately recognised and considered. In particular, ACCIE calls for **credit cards to be explicitly included in the ongoing considerations on co-badging**. This would ensure that a significant share of payment cards is not inadvertently excluded, thereby limiting the potential benefits of co-badging. The co-badging framework should also maintain high security standards and ensure that participation is voluntary and appropriately compensated. ACCIE therefore encourages the ECB, the ERPB and the co-legislators to take these principles into account when developing the technical and regulatory framework for co-badging.

[3] ECB (2026). ERPB Fit in the Ecosystem Workstream. *Co-badging technical deep dive*.
[4] Payments Europe (2025). *Safety, Convenience and Choice: The True Value of Cards*.
[5] ECB (2025). Fit of the digital euro in the payment ecosystem. *Report on the dedicated Euro Retail Payments Board (ERPB) technical workstream*.