



# Position Paper

## “Towards an integrated European market for card, internet and mobile payments” European Commission Green Paper COM(2011) 941 final EMOTA position

EMOTA<sup>1</sup>'s main goal is to assist policy makers in removing any barriers to cross-border trade. EMOTA's commitment to a barrier free EU Single Market is long standing and can be traced across all our positions and actions. We are making the following comments with the aim to constructively contribute to the debate over the future of the EU Digital Single Market for products and services by reflecting the views of online sellers across 17 markets, including the largest.

The European Commission is quite right by saying that secure, efficient, competitive and innovative electronic payments are crucial for e-commerce. This is also the first general point EMOTA would like to highlight in this context: more competition and innovation in the field of payment solutions for online transactions are most welcomed.

As the Commission is aware of, the payment landscape is quite fragmented across the European Union. Data EMOTA collected from his members reveals that the payment methods preferred by consumers when shopping online vary to a large extent. By way of example, consumers in Western European countries are confident in paying by payment card. This is by far not the case in Eastern and South-Eastern European countries where the predominant payment method is cash on delivery. On other markets, bank transfers after delivery are quite popular; or online banking solutions on others. In order to ensure profitable business, traders must be in a position to meet these consumer preferences and expectations regarding the availability of a specific payment method. How can they do so in a cross-border context with the options presently available?

Obviously, the situation is not condemned to stay unchanged. The payment industry should work on services that are secure, easy to use for buyers – convenience being very important - and easy to integrate for e-sellers. There is room for the development of more options that fit with consumer expectations respectively, are attractive enough to be considered as a “real” alternative to a long established method enjoying consumer trust locally. The seller should then be able to decide which specific payment methods he/she wishes to accept and make available to buyers. Hence, choice is another important factor. There should be reliable and safe independent players on the market so that merchants and customers can really choose between different payment methods. Lack of choice bears

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<sup>1</sup> EMOTA, the European eCommerce and Omni Channel Trade Association, is the European level umbrella federation representing online and distance sellers across Europe. The main mission of EMOTA is to promote eCommerce and Distance Selling and help policy makers remove any barriers to cross-border selling. Transparency register N° 11251212351-96



the risk of consumers abandoning a started purchase thus lowering the chances that a net surfer becomes a customer.

However, EMOTA is afraid the development of competitive and modern payment solutions for the European Single Market is not keeping pace with the growing interest in online business. Therefore, (cross-border) e-commerce is still rather dependent on payment cards.

On the issue of enhanced transparency, especially concerning the information provided to consumers with regards to the payment costs mentioned in the Green Paper, EMOTA should stress that commercial competition between traders must be taken into consideration. Traders must have the choice of making the information regarding the different payment fees available, but they should not be forced to do so.

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