
EBA CONSUMER TRENDS REPORT 2024/25

26 MARCH 2025
EBA/REP/2025/08



Contents

Figures	3
Abbreviations	4
Executive Summary	5
Background	7
Chapter 1: EBA and NCAs measures to address the CTR 2022/23 topical issues	9
Topical issues identified in the CTR 2022/23	9
Measures taken by the EBA	9
Measures taken by NCAs	12
Chapter 2: Retail banking products and services	15
Residential mortgages	15
Consumer credit	22
Payment services	27
Electronic money	29
Payment accounts	30
Deposits	32
Chapter 3: Topical issues	35
Payment fraud	35
Indebtedness	38
Unwarranted de-risking	40
Conclusions	43
List of References	44

Figures

Figure 1: Residential mortgages as a percentage of loans to households, 2015 - 2024 (EU27)	16
Figure 2: Annualised rate of lending for house purchases in the EU, 2010 - 2024	17
Figure 3: Lending for house purchases, 2015 - 2024 (in euro) – EU27	17
Figure 4: Share of new loans with variable rate by country, March 2019 - March 2024 (EU27)	18
Figure 5: Percentage of arrears on mortgage or rent payments, 2015 - 2023 (EU27)	19
Figure 6: Share of loans with forbearance measures over all household loans, 2015 - 2024 (EU/EEA) (MC1)	19
Figure 7: Share of loans with forbearance measures over all household loans, June 2023 – June 2024, by country (MC1)	20
Figure 8: Share of NPLs collateralised by immovable property over all loans collateralised by immovable property, 2015 - 2024 (EU/EEA) (MC2)	21
Figure 9: Share of NPLs collateralised by immovable property over all loans collateralised by immovable property, June 2023 – June 2024, by country (MC2)	21
Figure 10: Outstanding amount and interest rate of consumer credit in the EU across time, 2015 - 2023 (in euro)	23
Figure 11: Percentage of arrears on loan repayments for consumer credit, 2015 – 2023 (EU27)	24
Figure 12: Share of NPLs from credit for consumption over all credit for consumption, 2015 - 2024, (EU/EEA) (OCL1)	25
Figure 13: Share of NPLs from credit for consumption over all credit for consumption, June 2023 – June 2024, by country (OCL1)	25
Figure 14: Total number of payments per type of payment service, 2015 - 2021	28
Figure 15: Percentage of the population aged 15 years or over holding a payment account in the EU	31
Figure 16: Deposits held by households, 2015 - 2023 (billion euro, outstanding amounts)	33
Figure 17: Saving rate and interest rates in the EU, 2015 - 2023	34
Figure 18: Distribution and average of scores attributed by respondents to the topical issue of payment fraud	36
Figure 19: Distribution and average of scores attributed by respondents to the topical issue of indebtedness	38
Figure 20: Distribution and average of scores attributed by respondents to the topical issue of unwarranted de-risking	40

Abbreviations

AI	Artificial Intelligence	FIN-NET	Financial Dispute Resolution Network
AISs	Account Information Services	IBAN	International Bank Account Number
AML	Anti-money laundering	ICT	Information and Communication Technology
AMLD	Anti-Money Laundering Directive	ID	Identity Document
APP	Authorised Push Payment	IPR	Instant Payments Regulation
ATM	Automated Teller Machine	ITS	Implementing Technical Standards
BNPL	Buy Now Pay Later	LTV	Loan-to-value
CCD	Consumer Credit Directive	MCD	Mortgage Credit Directive
CCD2	Revised Consumer Credit Directive	MiFIR	Markets in Financial Instruments Regulation
CDD	Customer Due Diligence	MiCAR	Market in Crypto-Assets Regulation
CFT	Countering the financing of terrorism	ML/TF	Money laundering / terrorism financing
CSD	Credit Servicers Directive	MS	Member State
CTR	Consumer Trends Report	NBLs	Non-bank Lenders
CWA	Creditworthiness Assessment	NCA	National Competent Authority
DGS	Deposit Guarantee Scheme	NGOs	Non-governmental organisations
DGSD	Deposit Guarantee Scheme Directive	NPLs	Non-performing Loans
DORA	Digital Operational Resilience Act	PAD	Payment Accounts Directive
DSTI	Debt-service-to-income	PIs	Payment Institutions
EBA	European Banking Authority	PISs	Payment Initiation Services
ECB	European Central Bank	PSD2	Payment Services Directive 2
EEA	European Economic Area	PSD3	Revised Payment Services Directive
EIOPA	European Insurance and Occupational Pensions Authority	PSP	Payment Services Provider
EMD	Electronic Money Directive	PSR	Payment Services Regulation
EMI	Electronic Money Institution	RRI	Retail Risk Indicator
ESAs	European Supervisory Authorities	SCA	Strong Customer Authentication
ESIS	European Standardised Information Sheet	SD	Structured Deposits
ESMA	European Securities and Markets Authority	SECCI	Standard European Consumer Credit Information
EU	European Union	SIM	Subscriber Identity Module
FIs	Financial Institutions	SMS	Short Message Service

Executive Summary

Article 9(1) of its Founding Regulation requires the European Banking Authority (EBA) to collect, analyse and report on consumer trends. To deliver on this mandate, the EBA regularly publishes a Consumer Trends Report (CTR). The objective of the CTR is to set out trends and issues observed in the two years covered by the report in relation to the retail banking products and services within the EBA's remit, to identify the topical issues that arise or have arisen for European Union (EU) consumers, and to reflect on measures that the EBA and national competent authorities (NCAs) have taken to address issues identified in the previous edition.

With regards to the structure of the report, the 2024/25 edition is split into three chapters. Chapter 1 summarises the measures adopted by the EBA and NCAs to address the issues identified in the previous edition from 2 years ago, i.e., fraud in retail payments and over-indebtedness and arrears. The EBA measures include an Opinion on new types of payment fraud, a Report on Payment fraud data, and a Report on non-bank lenders' (NBLs) practices for creditworthiness assessment (CWA). NCAs, in turn, took regulatory and supervisory actions aimed at, *inter alia*, monitoring payment services providers' (PSPs) level of compliance with strong customer authentication (SCA) requirements and fraud prevention, introducing caps on interest rates to mitigate borrowers' repayment difficulties, and carrying out educational initiatives to raise consumers awareness on these two topical issues.

Chapter 2, in turn, observes the following trends for the retail banking products in the EBA's remit:

- Residential mortgages account for 79% of the volume of loans to households in EU Member States (MSs) in 2024, up from 75% in 2015. Borrowers' repayment capability appears to be the main risk identified, coinciding with the changes in central bank interest rates.
- The volume of consumer credit granted by banks and NBLs has steadily increased since 2020, in particular small, fast, accessible and short-term credit (in more recent times also referred to as 'Buy Now Pay Later' (BNPL) credit). The most relevant issues arising for these credit products are poor creditworthiness assessment practices and poor and/or late provision of pre-contractual information and documentation.
- Consumers' use of digital payment services has also increased. Payment fraud is still the most relevant issue, as fraudsters have adopted more sophisticated techniques, followed by lack of transparency of contractual terms and conditions.
- Electronic money plays a significant role only in some jurisdictions. The most frequently reported issue concerns the lack of transparency of terms and conditions, in particular in relation to fees and charges.
- Payment accounts continue to be widespread across consumers in the EU, to manage daily activities, receive salaries, and execute payments. The denial of access to (basic) payment

accounts is a rising concern for consumers, together with the lack of transparency of terms and conditions of the contract, and the level and number of fees.

- Deposits continue to play a crucial role in the stability and growth of the economy. Overnight deposits held by households have grown significantly until 2021 and have since then fallen sharply, coinciding with the increase in interest rates and the increase, in turn, in the number of contracts for deposits with agreed maturity. Lack of transparency in the provision of pre-contractual information and in the level and amount of fees and remuneration offered are still high on the supervisory agenda of several NCAs.

In the third and final Chapter, the CTR identifies three topical issues as most relevant:

- *Payment fraud* is still the most significant issue for EU consumers as a result of new types of fraud such as "Authorised Push Payment" (APP) fraud, where the payer is manipulated into making a payment to the fraudster. The high number of unauthorised payment transactions and applicability of the liability rules are also significantly impacting consumers.
- *Indebtedness* emerges as the second most relevant issue, coinciding with the rise of interest rates and inflation that started at the end of 2022. The rise of BNPL and other types of small, fast, accessible and short-term credit is how the issue most frequently manifests itself, followed by inadequate creditworthiness assessment practices of lenders and disclosure of pre-contractual information.
- *Unwarranted de-risking* is the third most relevant issue, with many consumers facing increased difficulties of accessing bank accounts. This seems particularly true for specific categories of vulnerable consumers, i.e., migrants, refugees, the homeless, cross-border workers, and individuals with poor financial histories. This issue materialises in different ways, such as a lack of (prompt) communication from the provider about the denial/suspension/closure of the account and reasons thereof.

As a next step, the EBA will assess which actions to take in 2025/26 to address the topical issues identified in this report and, in so doing, further enhance consumer protection across the EU.

Background

1. As per the mandate in its Founding Regulation, the EBA promotes a transparent, simple and fair internal market for consumer financial products and services, and fosters consumer protection in all EU MS by identifying and addressing consumer detriment in the financial services sector. Furthermore, the EBA assesses the retail conduct of financial firms and contributes to the stability, integrity and effectiveness of the financial system.¹
2. More specifically, Article 9(1) of its Founding Regulation mandates the EBA to collect, analyse and report on consumer trends. Therefore, the EBA regularly publishes a CTR, first on an annual basis, starting in 2013 and, since 2019, as a biennial publication.
3. The objective of the CTR is to set out the trends and issues that the EBA has observed in the two years covered by the report in relation to the retail banking products and services within its remit, and to identify the topical issues that arise or have arisen for EU consumers. Furthermore, the CTR reflects on the measures that the NCAs have taken to address the issues identified in the previous edition and those implemented by the EBA.
4. The retail banking products and services that are covered in this CTR comprise all those that fall within the scope of action of the EBA's consumer protection mandate, i.e. residential mortgages, consumer credit, payment services and electronic money, payment accounts and deposits (including structured deposits).² In 2024, two additional products/services have been added to the EBA's scope of action, the servicing of non-performing loans (NPLs) and the issuance of crypto assets (asset-referenced tokens and e-money tokens), as a result of the entry into force of, respectively, the Credit Servicers Directive (CSD)³ and the Market in Crypto-Assets Regulation (MiCAR)⁴. As this CTR covers trends observed in 2022 and 2023, these new products and services are not yet included in the report but will be included in future editions, as the EBA will start monitoring their evolution.

¹ Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC, available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010R1093>

² As set out in the Mortgage Credit Directive (EU 2014/17/EU), the Consumer Credit Directive (EU 2008/48/EC), the revised Payment Services Directive (EU 2015/2366), the Electronic Money Directive (EU 2009/110/EC), the Payment Accounts Directive (EU 2014/92/EU), the Deposit Guarantee Scheme Directive (EU 2014/49/EU), and the Markets in Financial Instruments Regulation (EU 600/14).

³ Directive (EU) 2021/2167 of the European Parliament and of the Council of 24 November 2021 on credit servicers and credit purchasers and amending Directives 2008/48/EC and 2014/17/EU, OJ L 438, 08/12/2021, p. 1–37, available at <https://eur-lex.europa.eu/eli/dir/2021/2167/oj>

⁴ Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937, OJ L 150, 9.6.2023, p. 40–205, available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02023R1114-20240109>

5. With regards to the methodology used to develop this CTR, the EBA collected input from NCAs in the 27 EU Member States, several national and EU consumer associations, the national ombudsmen that are members of the financial dispute resolution network (FIN-NET), and several EU industry associations. The EBA requested NCAs and the other stakeholders to identify the topical consumer issues and trends observed in 2022 and 2023 for the retail banking products and services under EBA remit and that they therefore consider the EBA should address in 2025 and beyond. This also included a dedicated workshop with representatives of national and EU consumer associations to discuss the consumer protection issues they observe.
6. The CTR was further complemented by the EBA's gathering and analysis of statistical datasets and reports on market developments across financial services, produced by public sources, such as Eurostat, the European Central Bank (ECB) and the World Bank⁵, as well as trends observed by the EBA's annually published Risk Retail Indicators (RRI).⁶
7. With regards to the structure of the report, the 2024/25 edition is split into three chapters that are presented in chronological order. Chapter 1 summarises the measures adopted by the EBA and NCAs to address the issues identified in the previous edition from 2 years ago. The report then continues with Chapter 2, which presents the updated trends for the retail banking products and services that are within the scope of action of the EBA's consumer protection mandate and that are therefore monitored by the EBA. The chapter provides a short introduction to the legal and regulatory framework applicable to each product/service, their evolution and trends, relevant issues observed, the main reasons for complaints reported by NCAs and FIN-NET members, and the relevant regulatory and supervisory measures adopted by NCAs and the EBA. For the first time, the 2024/25 CTR also presents data on the activities of NBLs⁷ and this is so as a result of the recent EBA analysis into CWA practices of this type of lenders, which identified a number of issues worth monitoring.⁸
8. Finally, Chapter 3 presents the topical issues that NCAs and other stakeholders have identified as relevant to the EBA. The 2024/25 edition identifies three issues that impact EU consumers most: 'payment fraud', 'indebtedness', and 'unwarranted de-risking'. While the first two issues had emerged already in the CTR 2022/23 as 'fraud in retail payments' and 'over-indebtedness and arrears', the third issue 'unwarranted de-risking' increased in significance compared to previous editions of the report to the extent that it is now listed as a relevant issue. The description of each topical issue consists of a brief introduction of the topic and its relevance, the most relevant ways they materialise across the EU, and the regulatory and supervisory measures, where available, which NCAs have already undertaken to address some of the relevant issues.

⁵ Data set and years of reference are indicated in each figure/graph.

⁶ [EBA Risk Retail Indicators](#)

⁷ For the purpose of this report, 'non-bank lenders' are understood as any creditor that is not a credit institution under the definition of the Capital Requirements Regulation and provides credit products subject to requirements of the Mortgage Credit Directive and/or Consumer Credit Directive.

⁸ See [EBA Report on the fact finding exercise on creditworthiness assessment practices of non-bank lenders](#) (EBA-Rep-2024-17).

Chapter 1: EBA and NCAs measures to address the CTR 2022/23 topical issues

9. This chapter describes the topical issues identified in the CTR 2022/23, which were fraud in retail payments and over-indebtedness and arrears, and summarises the measures the EBA and NCAs have taken respectively to address these issues.

Topical issues identified in the CTR 2022/23

10. The CTR 2022/23 identified two main issues for EU consumers:
- Fraud in Retail payment*, as evidenced by an increase in unauthorized payment transactions through various techniques (SIM swapping, ID spoofing, manipulation, spyware, and smishing) as well as fraud in payments/investments in crypto-assets.
 - Over-indebtedness and arrears*, as evidenced by financial institutions applying inadequate creditworthiness assessment procedures, which are a contributory factor to over-indebtedness alongside an increased need for credit as a result of the rising cost of living, increasing interest rates and increased accessibility of credit facilities through digital channels.

Measures taken by the EBA

11. Since the publication of the CTR 2022/23, the EBA has taken several measures to address the aforementioned two issues.

Fraud in retail payments

12. To address issues arising for EU consumers from fraud in retail payments, in April 2024 the EBA published an Opinion in which it assessed payment fraud data.⁹ In the Opinion, the EBA confirms that regulatory measures such as the SCA that the revised Payment Services Directive (PSD2) and the EBA's Technical Standards have imposed on the payments industry have been successful in achieving the aim of significantly reducing fraud that involves the stealing of customers' credentials. However, fraudsters have adapted their techniques and are using more complex and new types of fraud, such as those based on what is commonly referred to as 'social engineering'.
13. To mitigate these new fraud types, the Opinion proposes that additional security measures should be imposed in EU law, on top of those already articulated in the EU Commission's proposals for the revised Payment Services Directive (PSD3) and Payment Services Regulation

⁹ EBA Opinion on new types of payment fraud and possible mitigants (EBA-Op/2024/01), available at <https://www.eba.europa.eu/publications-and-media/press-releases/eba-has-identified-new-types-payment-fraud-and-proposes-measures-mitigate-underlying-risks-and>

(PSR) as well as the provisions that recently entered into force through the Instant Payments Regulation (IPR).

14. Furthermore, in August 2024, the EBA and the ECB published a joint Report on payment fraud.¹⁰ The report presents payment fraud data reported by the industry across the European Economic Area (EEA), which amounted to a total value of €4.3bn in 2022 and €2.0bn in the first half of 2023. Furthermore, the report finds that transactions authorised through SCA incurred lower fraud rates than non-SCA transactions, especially for card payments, and this was so in terms of both values and volumes.
15. The data thus confirmed the beneficial impact on fraud levels of SCA requirements that were introduced by the PSD2 and the supporting technical standards that the EBA had issued in 2018 in close cooperation with the ECB, but also conceded that fraud levels remain high due to emerging new fraud types¹¹. The EBA and the ECB will continue to monitor fraud data and going forward will update the report on an annual basis.

Over-indebtedness and arrears

16. To address the issues of over-indebtedness and arrears, in turn, in May 2023, the EBA jointly with the other two European Supervisory Authorities (ESAs), the European Securities and Markets Authority (ESMA) and the European Insurance and Occupational Pensions Authority (EIOPA), published an interactive factsheet to help consumers understand how the increases in inflation and interest rates can affect their money, including the financial products and services that consumers hold or plan to buy, such as loans, savings, financial investments, insurance and pensions.¹²
17. The factsheet used a consumer-friendly language and communication style to reach a broad audience, by setting out five key points on personal finances management consumers should bear in mind, providing answers to frequently asked questions and steps consumers can take to deal with the impact of inflation and rising interest rates on their finances, and explaining specific terms in a simple and easy-to-understand way with the use of pop-up boxes.
18. To further promote this interactive factsheet across EU, the ESAs worked closely with national supervisory authorities to translate the document into all EU languages and reproduce it on the latter's websites, with a view to maximise the accessibility for those meant to benefit from it: the consumers.

¹⁰ [The EBA and ECB release a joint report on payment fraud | European Banking Authority \(europa.eu\)](https://www.eba.europa.eu/sites/default/files/document_library/Publications/Other%20publications/2023/Inflation%20factsheets/1055311/How%20does%20high%20inflation%20and%20the%20rise%20in%20interest%20rates%20affect%20my%20money.pdf)

¹¹ Commission Delegated Regulation (EU) 2018/389 of 27 November 2017 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to regulatory technical standards for strong customer authentication and common and secure open standards of communication, OJ L 69, 13.3.2018, p. 23–43, available here https://eur-lex.europa.eu/eli/reg_del/2018/389/oj

¹² ESAs draw consumers' attention to how rises in inflation and interest rates might affect their finances, available at https://www.eba.europa.eu/sites/default/files/document_library/Publications/Other%20publications/2023/Inflation%20factsheets/1055311/How%20does%20high%20inflation%20and%20the%20rise%20in%20interest%20rates%20affect%20my%20money.pdf

19. Further, in December 2023, the EBA published the first peer review that focused exclusively on conduct and consumer protection issues.¹³ The review assessed the effectiveness of the supervision by seven NCAs of the treatment by creditors of mortgage borrowers in arrears under the Mortgage Credit Directive (MCD). In particular, the review examined whether the steps NCAs have taken effectively ensure that consumers in payment difficulties benefit from reasonable forbearance, taking into account the EBA Guidelines on arrears and foreclosures (EBA/GL/2015/12)¹⁴ and the EBA Opinion on good practices for mortgage creditworthiness assessments and arrears and foreclosure that had been published eight years earlier.¹⁵
20. The review, which was developed against the background of the economic conditions and the high-interest rate environment prevalent in 2023, found that competent authorities' supervision is overall effective and has been adapted to reflect the current interest rates environment and risks to mortgage borrowers. However, the review also found some differences in the level of scrutiny that the competent authorities apply to creditors.
21. The peer review report therefore recommended follow-up measures that competent authorities are required to take, to ensure that supervisory measures to mitigate consumer detriment are taken before the detriment materialises. The report also sets out some best practices that might be of benefit for other competent authorities to adopt. In mid-2025, the EBA will start carrying out a follow-up exercise on the findings of this peer review, to assess the steps NCAs have taken to implement the recommendations and improve their supervision.
22. Further, in August 2024, the EBA published the results of a fact-finding exercise on the CWA practices of NBLs¹⁶. This exercise was a follow-up to the finding in the CTR 2022/23 that NBLs and their CWA practices have a contributory role in over-indebtedness. The EBA requested information from a sample of 125 NBLs across the EU via their NCAs. The exercise found that, while some NBLs might service segments of the population that may have limited opportunities to access traditional banks for credit, a significant number of them appear to apply inadequate practices for information gathering and verification during their CWAs.
23. The report also found that the lack of a harmonised definition of NBLs and of a harmonised authorisation framework in the EU contribute to different types of NBLs being supervised in

¹³ Peer review report supervision of treatment of mortgage borrowers in arrears (EBA/REP/2023/37), available at <https://www.eba.europa.eu/sites/default/files/2023-12/d81f7153-a5f0-4da0-83d8-98edae9c21f9/Peer%20review%20on%20the%20supervision%20of%20creditors%20treatment%20of%20mortgage%20borrowers%20in%20arrears.pdf>

¹⁴ EBA Guidelines on arrears and foreclosure (EBA/GL/2015/12), available at https://www.eba.europa.eu/sites/default/files/documents/10180/1163130/7fa86adb-5661-41a9-8d49-7ac2e20958fd/EBA-GL-2015-12_EN_GL%20on%20arrears%20and%20foreclosure.pdf?retry=1

¹⁵ Opinion of the European Banking Authority on good practices for mortgage creditworthiness assessments and arrears and foreclosure, including expected mortgage payment difficulties (EBA/Op/2015/09), available at <https://www.eba.europa.eu/sites/default/files/documents/10180/983359/863acf45-6ad1-4b22-829e-3077e8496119/EBA-Op-2015-09%20Opinion%20on%20good%20practices%20for%20mortgages.pdf>

¹⁶ Report on the fact finding exercise on creditworthiness assessment practices of non-bank lenders (EBA-Rep-2024-18), available at <https://www.eba.europa.eu/sites/default/files/2024-08/42604728-69b1-46f1-9c46-c91fa4564f08/Report%20on%20the%20fact%20finding%20exercise%20on%20creditworthiness%20assessment%20practices%20of%20non-bank%20lenders.pdf>

different ways across EU Member States. Consequently, different rules apply to entities that are of a similar kind across the EU.¹⁷

24. Furthermore, the report found that many NCAs have taken supervisory actions in respect of NBLs. However, the surge in the number and significance of these entities increases the need for specialised resources dedicated to the monitoring of non-bank lending activities, and many NCAs do not have such resources.
25. In terms of market trends, the report showed that the proportion of credit granted by the surveyed NBLs under the Consumer Credit Directive (CCD) over the total of credit granted increased between 2020 and 2023, with a peak of 43% in 2021. In the same period, the proportion of loans granted under the MCD by the surveyed NBLs decreased from 58% to 45%.
26. The EBA will continue monitoring the activities of NBLs and may consider, depending on the findings and the need, initiating further ad hoc action to foster further protection of EU consumers.

Measures taken by NCAs

27. NCAs have taken several regulatory and supervisory measures to address the topical issues identified in the CTR 2022/23 and in some cases also carried out educational initiatives for consumers. The following paragraphs provide a summary of the measures they adopted.

Fraud in retail payments

28. With regard to regulatory measures aimed at mitigating issues arising from fraud in retail payments, several NCAs indicated they are awaiting for the new EU PSD3/PSR prior to amending their respective national regulatory frameworks.
29. A few other NCAs, in turn, issued circulars and/or “dear CEO” letters focusing on fraud prevention and SCA requirements, while other authorities reported to have issued national rules, including guidelines, setting out requirements for the prevention, detection and management of fraud. One of these authorities published recommendations with good practices identified among financial institutions, while another in close cooperation with the competent Ministry established the legal framework for a national fraud monitoring system and a working group coordinated by the local Ministry of Justice with the aim of identifying fraudulent transactions.
30. NCAs also took various supervisory measures, which included planned or *ad hoc* off/on-site inspections to investigate the level of compliance of PSPs not only with SCA requirements but also with requirements for communication with consumers and staff training on prevention and detection of fraud. Additionally, other authorities monitored complaints received.

¹⁷ In this regard, the revised CCD, which will apply from November 2026, sets out clearer and more stringent CWA requirements and is therefore expected to address this issue at least for consumer credit.

31. Furthermore, some NCAs carried out supervisory reviews and thematic discussions with the industry focusing on the level of compliance of the institutions with the SCA requirements and other security provisions. In some instances, these initiatives were followed up by publications on fraudulent practices, phishing and unauthorised payments.
32. Finally, several authorities carried out educational initiatives to increase consumers' awareness about fraud and scams and educate them on how to avoid becoming a victim. The authorities used different tools and formats to do so, such as webinars, publication of information for consumers on their own website, cooperation with other national authorities, broadcasting on local television, and setting up a financial literacy centre.

Over-indebtedness and arrears

33. NCAs adopted several regulatory actions to mitigate the issues of over-indebtedness and arrears, as arising from both consumer credit and residential mortgages. Some of these actions aimed at transposing the CSD into national frameworks, while other measures initiated the transposition of the CCD2, with two authorities that already amended rules to adapt their national frameworks to the newly introduced provisions of arrears and foreclosure for consumer credits in line with the CSD. Furthermore, a few NCAs undertook initiatives at national level aimed at incorporating measures that (i) introduced caps on interest rates, (ii) set-up a register to help consumers in their responsible borrowing, (iii) enhanced cooperation between lenders and borrowers prior to termination of the contract due to repayment difficulties, and (iv) in the context of the increase in interest rates, contributed to the temporarily extension of triggers that require lenders to adopt procedures aiming at facilitating the renegotiation of credit contracts of borrowers in repayment difficulties.
 34. Several authorities adopted regulatory measures addressing exclusively residential mortgages. Of these NCAs, a few adopted specific macroprudential requirements for lending indicators, such as loan-to-value (LTV) or debt-service-to-income (DSTI) with the aim of ensuring responsible lending and borrowing. In another case, the national law was amended to (i) require mortgage credit providers to present two different and parallel credit offers to borrowers, one with a calculation with variable interest rates and the other one with fixed interest rates, and (ii) remove any cost or fee for refinancing the credit.
 35. Furthermore, another NCA adopted a new code of good practices which included, *inter alia*, the possibility for borrowers to switch from a variable interest rate to a fixed rate agreement without incurring in any cost. Another authority contributed to the implementation of a new set of measures aimed at mitigating the impact that the increase in interest rates and inflation have on borrowers with variable interest rates mortgages, including the temporary suspension of early repayment fees on variable rate loans. Finally, one NCA carried out a thematic review on early mortgages' arrears and issued "dear CEO" letters.
 36. A few other NCAs focused instead on regulatory actions for consumer credit products. Some of these authorities amended their national laws to include BNPL in the scope of their national law, and to introduce *ad hoc* CWA rules and reporting obligations for NBLs, including the number of loans granted and possible delays in loan repayments.
-

37. NCAs undertook also many and different supervisory actions to mitigate issues for EU consumers arising from over-indebtedness and arrears. These actions included not only onsite and off-site inspections on lending practices and information provided to consumers, focusing on CWA, but also supervisory reviews of (i) creditors' application of forbearance measures to borrowers in arrears, and (ii) level of compliance with national requirements to mitigate the increase in interest rates. A few other authorities engaged with the industry, including NBLs, to discuss responsible lending practices and issued guidelines on this theme, too.
38. With regards to supervisory measures adopted exclusively for consumer credit products, one NCA reported to have carried out a thematic review on both bank and non-bank lenders' CWA practices. In both instances, this NCA issued follow-up measures and identified best practices. A few other NCAs adopted specific guidelines on revolving credit, while two other authorities issued corrective measures, recommendations, and letters clarifying the application of responsible lending principles in consumer credit. More specifically, one of the two authorities assessed the advertising activities of lenders and, as a result of the findings, requested removal or rectification of the information provided.
39. Finally, a few NCAs carried out educational initiatives on over-indebtedness with a focus on revolving credit cards and BNPL, as well as the impact of inflation and increase in interest rates, and provision / request of pre-contractual information.

Chapter 2: Retail banking products and services

40. This chapter covers the trends and emerging issues observed for the retail banking products and services within the scope of action and monitoring of the EBA's consumer protection mandate, i.e. residential mortgages, consumer credit, payment services, electronic money, payment accounts and deposits. Furthermore, the chapter provides an overview of the applicable EU legal and regulatory frameworks and NCAs' regulatory and supervisory measures adopted to address such issues when not summarised in Chapter 1 above.
41. The analysis in this chapter is based on the same quantitative sources as previous editions, such as Eurostat, the World Bank, and the ECB data warehouse on retail banking services and products, but also makes use for the first time of the EBA's RRIs, where available. The EBA publishes RRIs annually through a separate publication, in fulfilment of its mandate in Article 9(1) of its Founding Regulation. The RRIs aim at timely identifying potential harm for consumers arising from the misconduct of the institutions and from wider economic conditions. Similarly, to the CTR itself, the RRIs support EBA and its NCAs in prioritizing their regulatory and supervisory work in the area of consumer protection.

Residential mortgages

Legal and regulatory framework in the EU

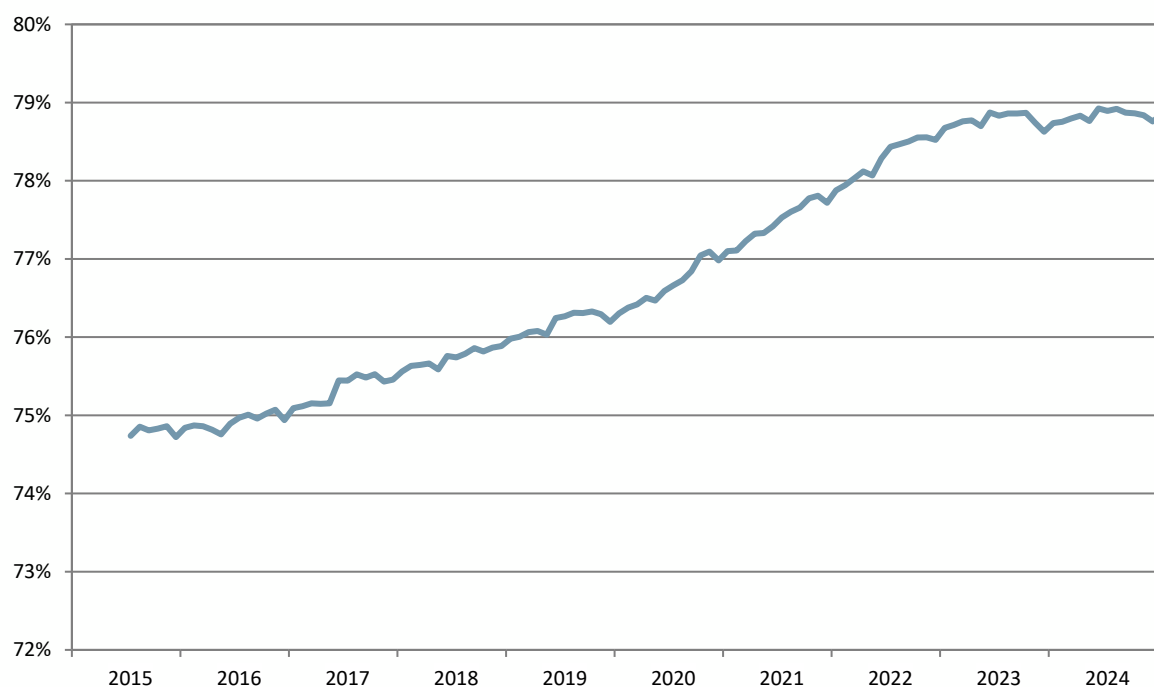
42. The MCD regulates residential mortgages across EU MSs. It entered into force in 2014 and is applicable since March 2016. The MCD was developed with a view to bringing about a more transparent, efficient and competitive internal EU market, through consistent, flexible and fair credit agreements relating to residential immovable property. The Directive also aimed at promoting responsible lending and borrowing practices and financial inclusion, thus providing a high level of consumer protection and financial stability. At the time, the EBA supported the implementation of the MCD by issuing a number of Technical Standards, Guidelines and Opinions.

Evolution and trends

43. Residential mortgage repayments represent a significant share of consumers' personal finances and in July 2024 accounted for 79% of loans to households in EU MSs with a slow but steady increase from 75% in 2015 (see Figure 1 below). Most NCAs indicated that residential mortgages represent the main financial obligation for households in their respective jurisdiction.
44. Following summer 2022, the increases in inflation and interest rates across the EU impacted consumers' disposable income as this translated in higher repayment obligations in the subsequent months. NCAs reported similar observations for their respective residential

mortgages markets, confirming that this product saw a decline by the end of 2022 to then increase in 2023. Some NCAs indicated that the increase may be driven by a number of governmental measures adopted in their respective jurisdiction to support consumers in the uptake of new loans. In a few countries, as reported by NCAs, the decline was sharp, and in two countries (not shown in Figure 2 as it reports aggregated EU data), it was as extreme as a 50% drop.

Figure 1: Residential mortgages as a percentage of loans to households, 2015 - 2024 (EU27)



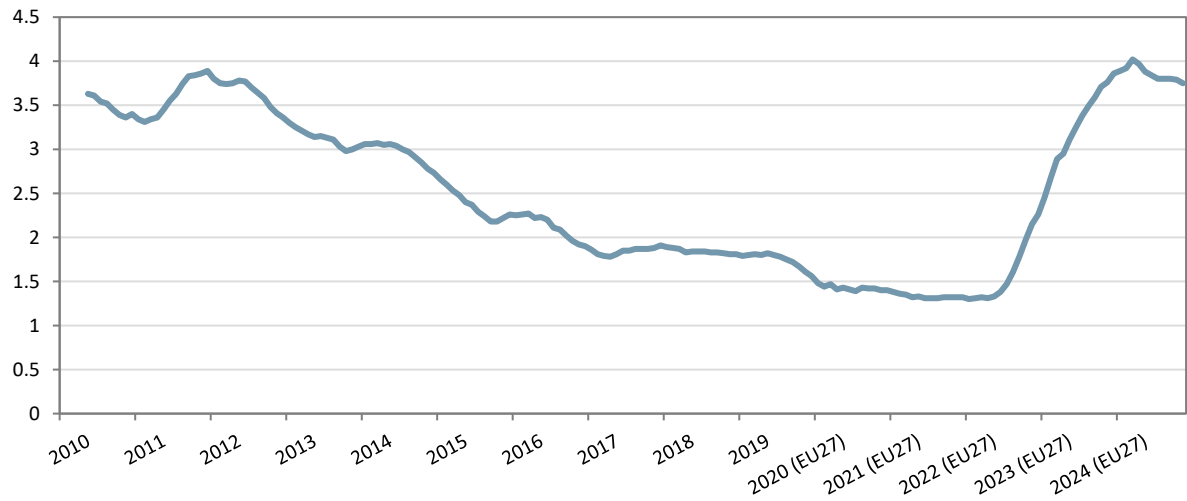
Source: ECB

Note: EU 27

45. Figure 2 below shows the cost of borrowing for households for house purchase (annual percentage charge in lending for house purchases)¹⁸, which was 4% in September 2011, 1.3% in January 2022, sharply rose to 4% in December 2023 possibly as a result of the increase in interest rates, and 3.75% in July 2024.

¹⁸ The cost of borrowing for households to purchase a house or an apartment.

Figure 2: Annualised rate of lending for house purchases in the EU, 2010 - 2024

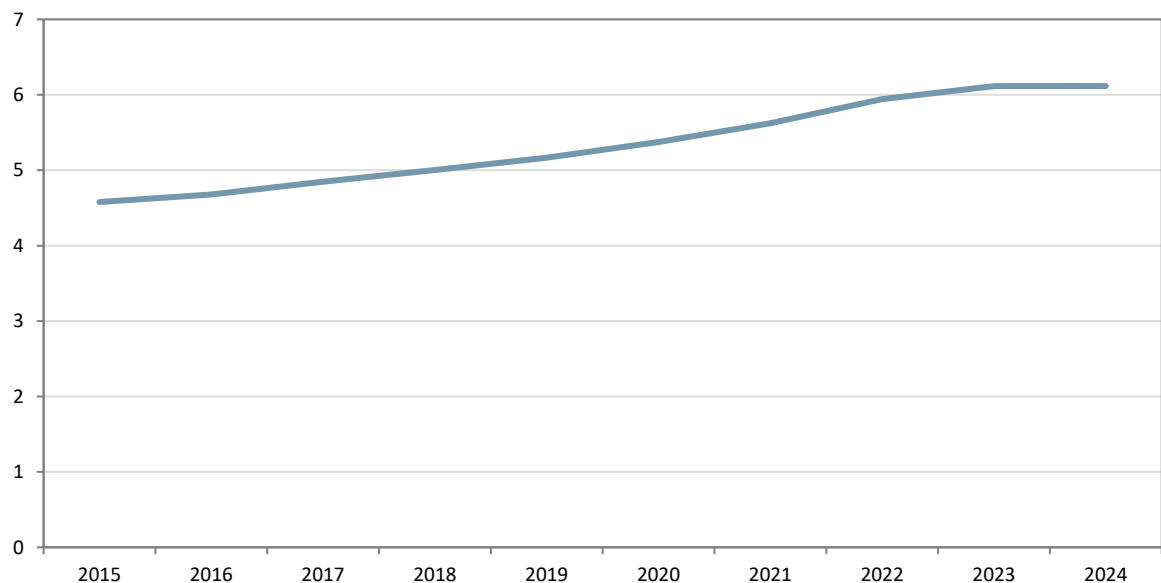


Source: ECB

Note: EU changing composition (EU 28 and EU 27 from 2020)

46. Lending for house purchases rose steadily upwards from Euro 4.6 trillion in January 2015 to Euro 6.10 trillion in July 2022, when consumers’ requests to uptake a mortgage reached a peak, probably as a result of the low interest rates applied on residential mortgages, and then remained at that level, at a time when interest rates increased again since then (see Figure 3).

Figure 3: Lending for house purchases, 2015 - 2024 (in euro) – EU27

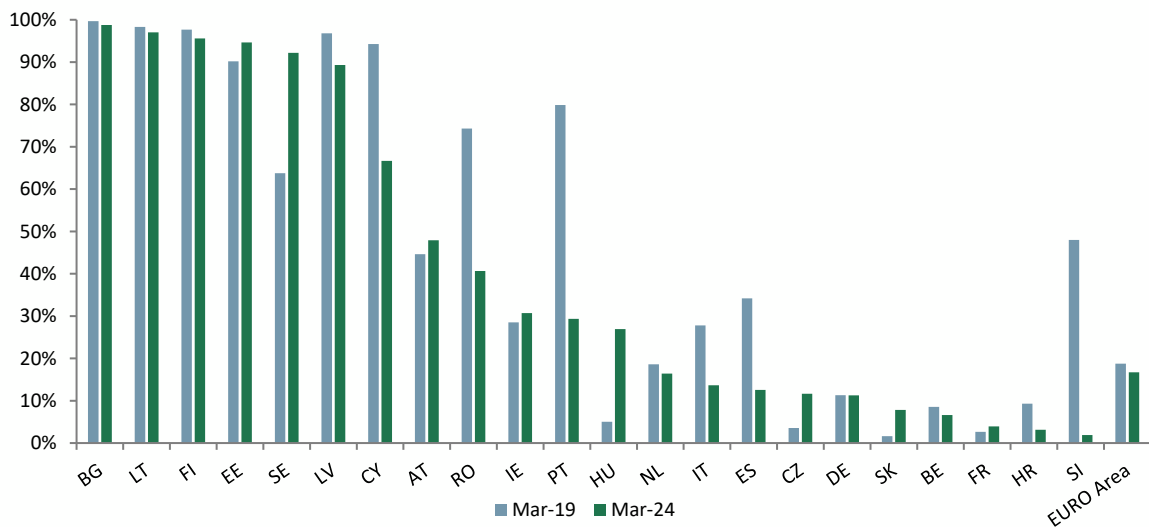


Source: ECB

Note: EU 27

47. Figure 4 below depicts the share of new loans with a variable rate by jurisdiction in March 2024 compared to March 2019, where data is available. While the share was relatively stable in many jurisdictions, several others saw a shift from variable interest rate to fixed and/or mixed interest rate mortgages predominance (not shown in the Figure 4). In the same period, a few MSs reporting a very high share between 80% and 90% of new loans with fixed interest rates.

Figure 4: Share of new loans with variable rate by country, March 2019 - March 2024 (EU27)



Source: ECB

Note: EU 27

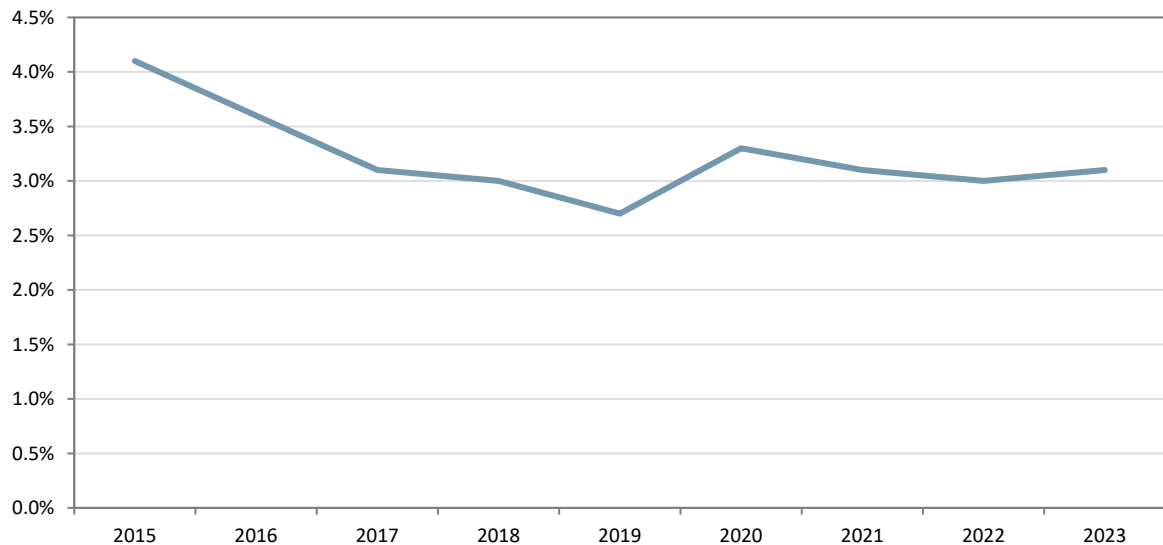
48. With regards to type of lenders providing residential mortgages, only few NCAs reported an increase in mortgages provided by NBLs since the last edition of the CTR, while the other authorities confirmed that the main lenders remain banks in their respective jurisdictions.

49. Another trend that emerged from the responses by NCAs is the continued shift towards digitalisation of the loan origination processes, with several NCAs highlighting the positive impact on consumers, including saving costs that would arise from fees related to non-digital processes.

Emerging issues

50. Borrowers' repayment capability is the main risk identified for residential mortgages, coinciding with the changes in central bank interest rates. In the particular case of residential mortgages, arrears can eventually also result in the repossession of the home, which can have significant social impact on the family and employment. Figure 5 below provides an overview of the percentage of arrears on mortgages or rent payments across EU MSs, with a decrease from 2015 to 2019 and then a spike to 3.3% in 2020, and a relatively stable evolution since then around 3.1%.

Figure 5: Percentage of arrears on mortgage or rent payments, 2015 - 2023 (EU27)

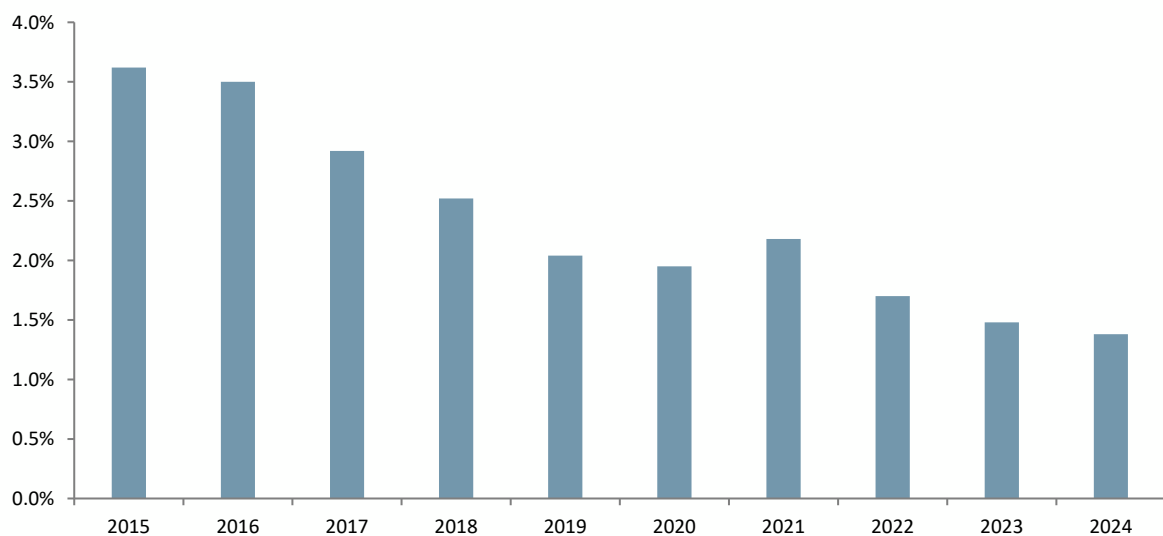


Source: Eurostat

Note: EU 27

51. For residential mortgages, the EBA's RRIs, too, capture the risks to consumers, by measuring the share of loans with forbearance measures, which aims to assess EU consumers' ability to repay their loans and their need to access forbearance measures. Between June 2015 and June 2020, the share of household loans with forbearance measures over total household loans decreased nearly continuously from 3.62% to 1.38%, as depicted in Figure 6 below:

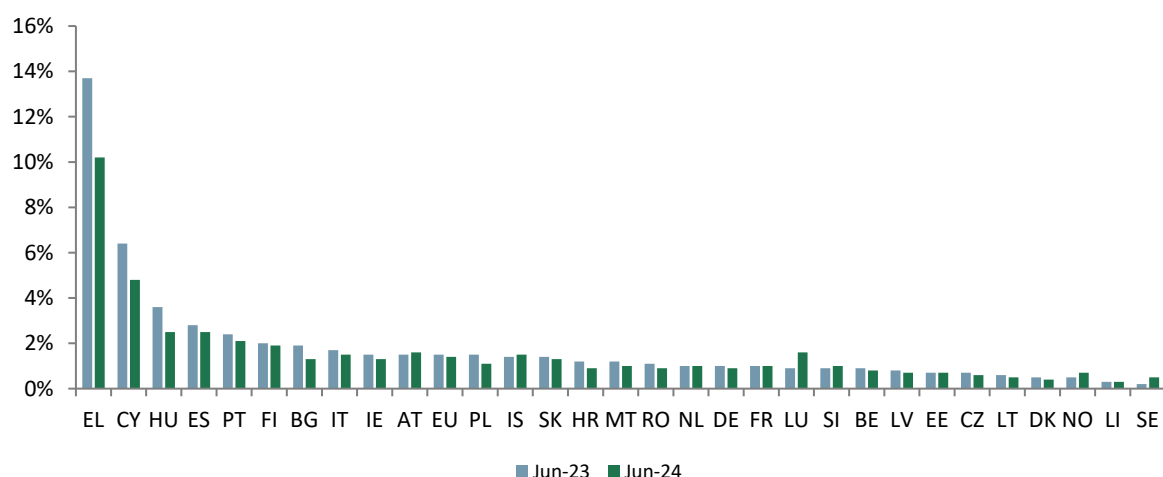
Figure 6: Share of loans with forbearance measures over all household loans, 2015 - 2024 (EU/EEA) (MC1)



Source: EBA supervisory reporting data

52. Between June 2023 and June 2024, the fall was significant in MSs with a comparatively high level of such loans, while the proportion of such loans increased significantly in other countries in Figure 7 below:

Figure 7: Share of loans with forbearance measures over all household loans, June 2023 – June 2024, by country (MC1)

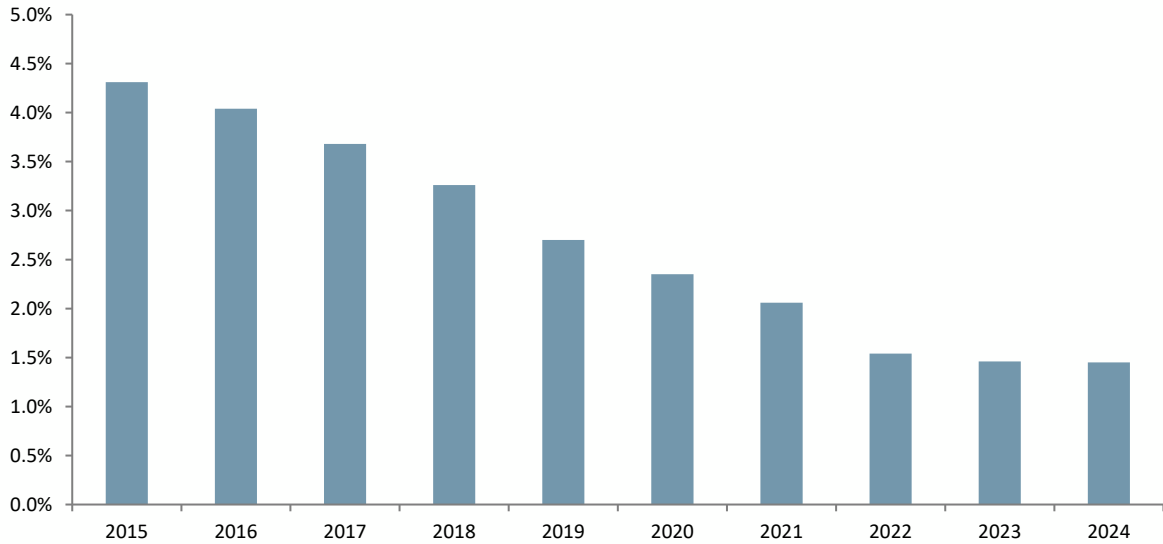


Source: EBA supervisory reporting data

53. The share of NPLs collateralised by residential immovable property aims to measure whether consumers face difficulties to make their mortgage payments. In general, a decrease in this ratio indicates that consumers' financial situation is improving. However, it may also be the case that over time banks change their business model and/or limit providing mortgage products to certain consumers, and/or sell their loan book to credit servicers.

54. Between June 2015 and June 2024, the share of NPLs collateralised by immovable properties over all such loans significantly dropped from 4.31% to 1.45% across the EU/EEAs, as Figure 8 below shows:

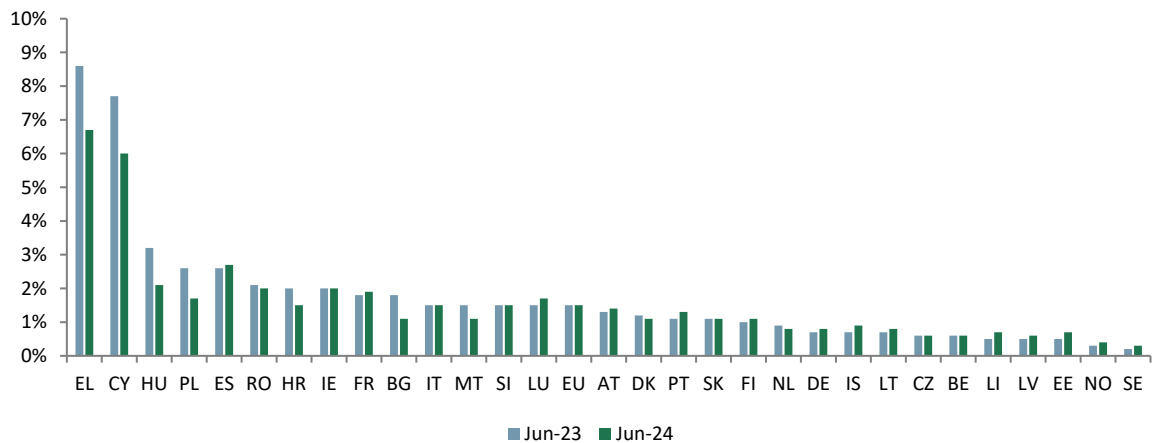
Figure 8: Share of NPLs collateralised by immovable property over all loans collateralised by immovable property, 2015 - 2024 (EU/EEA) (MC2)



Source: EBA supervisory reporting data

55. Between June 2023 and June 2024, among the Member States where the ratio decreased, the most significant falls were observed in MSs with a high proportion of NPLs. The only countries where the proportion of such loans increased noticeably were those with a very low proportion of NPLs last year (Figure 9 below):

Figure 9: Share of NPLs collateralised by immovable property over all loans collateralised by immovable property, June 2023 – June 2024, by country (MC2)



Source: EBA supervisory reporting data

56. NCAs observed several issues arising from residential mortgages for EU consumers, most of which then materialize in increased borrowing costs and/or repayment difficulties borrowers face as a result of the changed economic conditions. High level of indebtedness is likely to lead

to the consumer falling into arrears on their repayment obligations, which will result in poor credit histories, which in turn will significantly increase the future cost of credit.

57. The main issues reported by NCAs are the poor and/or late provision of information to the prospective borrowers in the pre-contractual phase, particularly with regards to the European Standardised Information Sheet (ESIS) resulting in the consumers not being able to make an informed decision. This issue was followed by lack of clarity on the level and number of different types of fees related to the contract, particularly for maintenance fees related to payment accounts linked to mortgage loans. Furthermore, NCAs reported lenders' inadequate CWA practices and barriers to digitalization for supervision.
58. A few other NCAs reported the increased indebtedness of consumers as the main issue in their jurisdiction, and inadequate engagement of lenders with borrowers in arrears or at risk to be so, as well as incorrect calculations when refinancing the contract or general issues with refinancing of already existing contracts with an initial low and fixed interest rate. Another few NCAs reported issues related to tying practices, such as the possibility to have a lower interest rate applied only if the borrowers purchase another financial product with the same lender.
59. Finally, NCAs and FIN-NET members provided data on complaints related to mortgages for the most recent years available (2022 and 2023), the number of which slightly increased. The data also showed that, similarly to the last edition of the CTR, the most common topics of the complaints are interest rates, followed by fees and charges, in particular early repayment fees, lack of transparency of the contractual terms and conditions, inadequate provision of information (pre-contractual and contractual), and the cross-selling of products.

Regulatory and supervisory measures at national level

60. NCAs adopted several regulatory and supervisory measures to mitigate the issues arising from residential mortgages for EU consumers. Chapter 1 above summarises the actions adopted to address over-indebtedness and arrears as this was one of the topical issues identified in the previous CTR. In addition to these measures, NCAs undertook other initiatives to mitigate issues arising from residential mortgages, such as the introduction of specific borrower-based measures for first time buyers and also for other types of borrowers, the adoption of corrective actions and other supervisory activities on lenders' and credit intermediaries' provision of information, in particular advertising and quality of the advice.

Consumer credit

Legal and regulatory framework in the EU

61. The currently applicable CCD entered into force in June 2008 and aimed at bringing about a more transparent, efficient and well-functioning internal EU market in consumer credit while ensuring a high level of consumer protection. The revision of the EBA Founding Regulation in 2020 brought this EU Directive fully into the scope of action of the EBA. Furthermore, in June 2021, the EBA Guidelines on Loan Origination and Monitoring (EBA/GL/2020/06) became applicable and since then institutions are expected to develop robust and prudent standards to

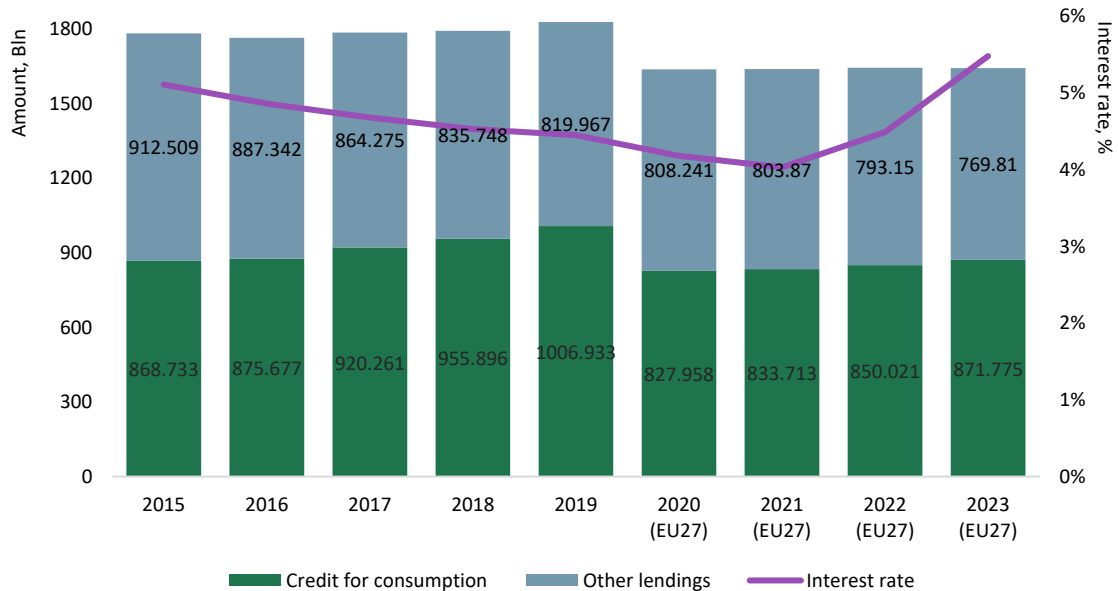
ensure newly originated loans under the MCD and CCD are assessed properly. The Guidelines also aim to ensure that the institutions' practices are aligned with consumer protection rules and respect fair treatment of consumers.

62. By contrast, this edition of the CTR does not capture trends of consumer credit products and contracts that have only very recently become subject to the EU law through the revised CCD (EU 2023/2225), because EU MSs still have until November 2025 to transpose the Directive into national law.

Evolution and trends

63. Consumer credit plays an important role in the daily lives of consumers and is widely used to satisfy their needs and have easy and fast access to liquidity. The volume of consumer credit has slightly and steadily increased between 2015 and 2019, to then decrease in 2020, where notably the composition of EU MSs changed and restrictive measures were imposed due to health concerns arising from COVID-19. Since then and until 2023, the volume has started to increase slowly again but has not yet reached its highest peak of 2019 (see Figure 10 below).

Figure 10: Outstanding amount and interest rate of consumer credit in the EU across time, 2015 - 2023 (in euro)¹⁹



Source: ECB

Note: EU changing composition (EU 28 + EU 27 from 2020)

64. Consistent with the data at EU level shown in the figure above in relation to credit for consumption, most NCAs reported an increasing trend for consumer credit in volume in their jurisdiction in recent years, and this is so for credit offered by both, bank lenders and NBLs for

¹⁹ The interest rate indicated refers to the average annual return. Credit for consumption considered in the graph comprises loans granted for mainly personal consumption of goods and services. Other lending considered in the graph comprises loans granted for purposes other than consumption and house purchase, such as business, debt consolidation, education, etc.. [Regulation \(EU\) 2021/379 of the ECB](#)

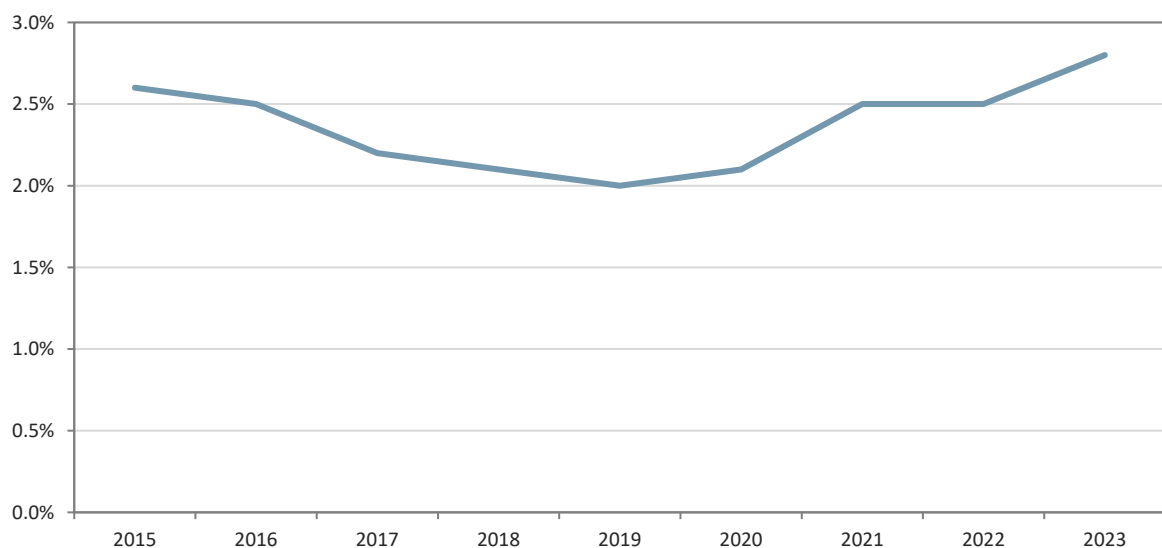
which data is available, probably as a result of the increased interest rates and cost of living. Only a few NCAs reported a stable evolution and only two authorities signalled a decrease.

65. In terms of types of products, several NCAs reported a steady increase in small, fast, accessible and short-term credit, in particular BNPL, with one authority indicating that value and volume of this product provided by NBLs marked a significant spike. The second most reported type of consumer credit product is car financing, for which in one jurisdiction the share provided by NBLs reached 90% of the total value of consumer credit. Other NCAs indicated personal loans, revolving credit, housing loans including for renovations or repairs and credit cards.
66. A few NCAs provided information about the type of lenders that offer consumer credit in their jurisdictions, with a few confirming that credit institutions represent the most important provider of such products, while two authorities indicated that NBLs are of increasing relevance as they offer different products, including BNPL, and fintech solutions.

Emerging issues

67. While consumer credit is crucial in the everyday life of consumers, as explained in Chapter 3 below, it can also give rise to difficulties for consumers in maintaining their financial obligations, as depicted in Figure 11 below.

Figure 11: Percentage of arrears on loan repayments for consumer credit, 2015 – 2023 (EU27)



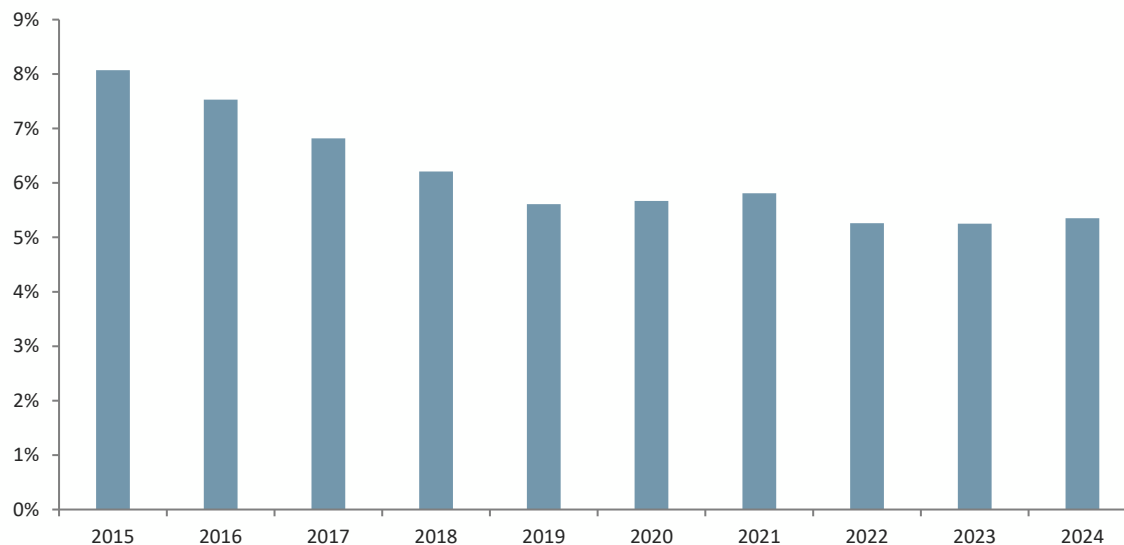
Source: Eurostat

Note: EU27

68. As RRI data below show, the share of NPLs from credit for consumption overall decreased from 8.7% in June 2015 to 5.35% in June 2024, as Figure 12 below shows:²⁰

²⁰ Credit for consumption refers to “loans granted for the purpose of mainly personal use in the consumption of goods and services” as per definition provided by [Regulation \(EU\) 2021/2379 of the ECB](#)

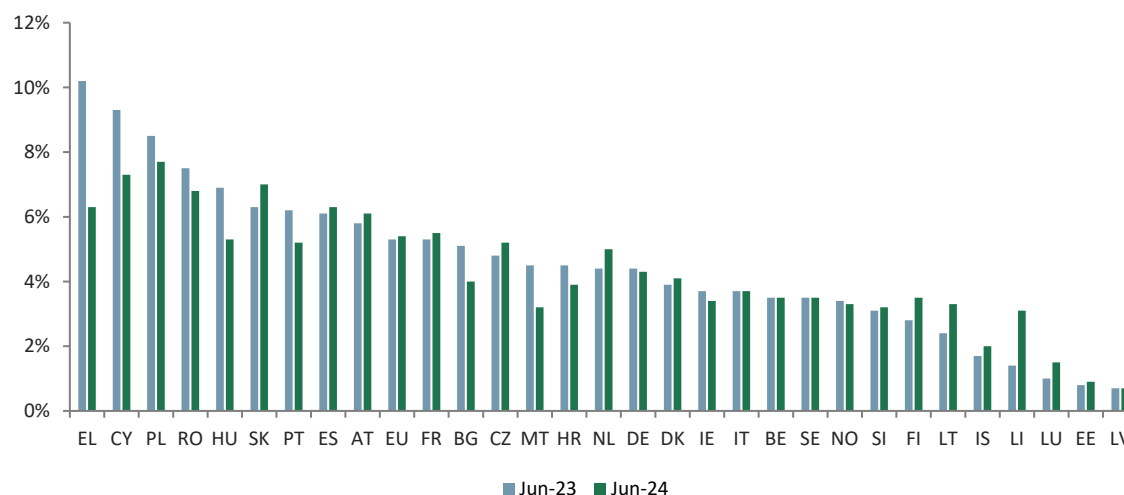
Figure 12: Share of NPLs from credit for consumption over all credit for consumption, 2015 - 2024, (EU/EEA) (OCL1)



Source: EBA supervisory reporting data

69. Between June 2023 and June 2024, the proportion of such NPLs decreased the most in MSs with high levels of NPLs, while slightly increasing in others (Figure 13 below).

Figure 13: Share of NPLs from credit for consumption over all credit for consumption, June 2023 – June 2024, by country (OCL1)



Source: EBA supervisory reporting data

70. NCAs reported several issues arising from consumer credit products for EU consumers, with inadequate CWA practices ranking first, which includes, among others, failure by lenders to properly assess all consumers’ expenses, improper use of automated scoring tools,

incorrectness of the information provided by the borrowers, and record keeping. In a few instances, authorities highlighted that this issue concerns particularly NBLs.

71. The poor and/or late provision of pre-contractual information and documentation is the issue that was reported next by NCAs, in particular related to the Standard European Consumer Credit Information (SECCI) prescribed under the CCD, the role of credit intermediaries, marketing, and revolving credit. NCAs have also indicated concerns about consumers' unawareness of the risks and features of credit products, especially as it concerns BNPL and other forms of small and fast credit.
72. As overarching issue, several NCAs indicated the digitalization of the consumer credit process as an emerging issue, starting from the provision of information on digital channels (which are more difficult to be thoroughly scrutinized by supervisors) and using aggressive advertising techniques which often do not highlight the risks and costs of the credit product. Finally, several NCAs expressed concerns about the increased popularity of BNPL and their easy accessibility for young adults.
73. Finally, NCAs and FIN-NET members submitted data about complaints received related to consumer credit, as provided by bank and non-bank lenders. The number of complaints received in 2023 was slightly lower than 2022. Furthermore, the most common reasons for the complaints were issues related to the calculation and application of interest rates, followed by poor and/or inadequate provision of information at pre-contractual and contractual stage, including inadequate creditworthiness assessment practices, lastly fees and costs levied with the credit.
74. With regards to complaints related to consumer credit provided by NBLs, inadequate creditworthiness assessment is the most common reason, followed by interest rates and provision of information. In 2023, poor provision of information, including regarding the fees levied, was the number one reason, followed by inadequate CWA practices, with this latter being the most common ground for complaints against NBLs in 2023.

Regulatory and supervisory measures at national level

75. In addition to the regulatory and supervisory measures adopted to mitigate the over-indebtedness and arrears that the previous edition of the CTR had identified, and as summarized in Chapter 1, NCAs reported the following actions:
 - a) Educational and/or regulatory initiatives on BNPL and revolving credit cards, including the issuance of guidelines on this latter product;
 - b) Monitoring of lenders' treatment of consumers in repayment difficulties;
 - c) Application of caps either on interest rates or on default interest rates;

- d) Different supervisory actions (e.g., mystery shopping, thematic investigations, desk-based analysis of websites) on lenders' and credit intermediaries' provision of information, including advertising practices.

Payment services

Legal and regulatory framework in the EU

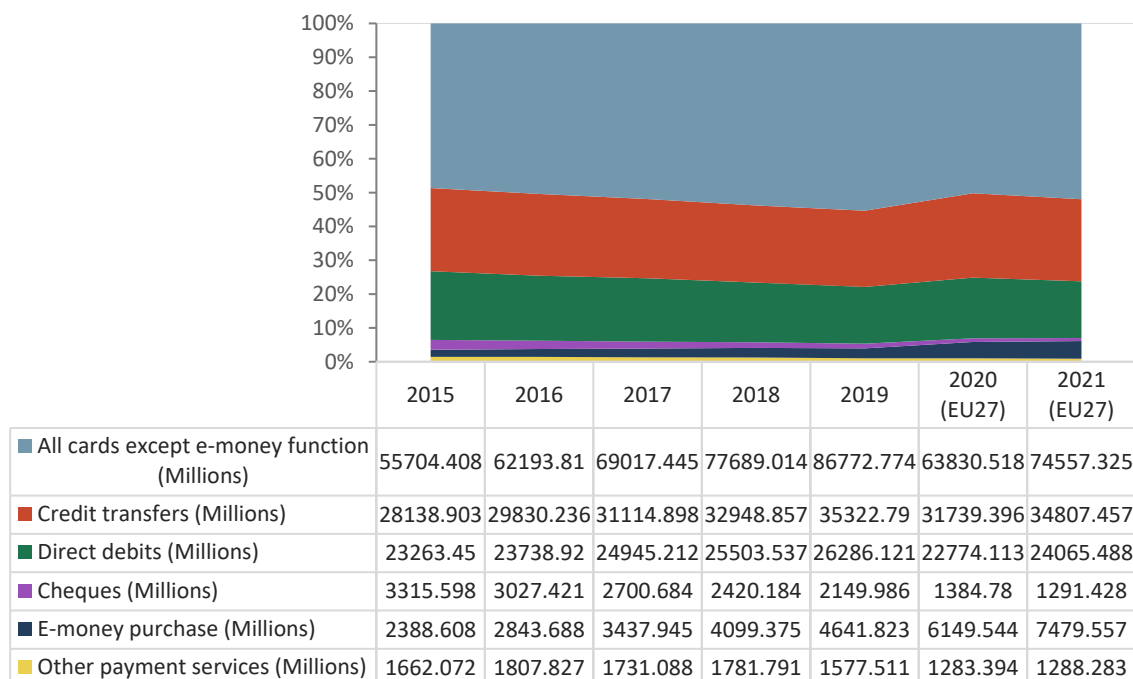
- 76. The PSD2, which applies since January 2018 and is being revised at the time of this report by the EU Commission and the EU co-legislators, lays down EU rules on PSPs regarding authorisation and registration, the use of agents, branches, their supervision, transparency of conditions and information requirements and the security of payments. PSD2 also brought into being the new account information services (AIS) and payment initiation services (PISs).
- 77. The aim of the Directive is to bring about a level playing field for existing and new players, enhance competition, facilitate innovation, enhance security, protect consumers, and to do so in a way that is technologically neutral. The EBA supported this with six technical standards, six sets of guidelines, more than 250 answers to questions received from external stakeholders via the EBA Q&A tool and through nine Opinions.²¹

Evolution and trends

- 78. Secure and innovative payment services are important for the well-functioning of the financial sector and the wider economy. Almost all NCAs reported a steady and continuous increase in consumers' use of digital payment services, with only few authorities indicating that cash is still a relevant payment method. Figure 14 below provides an overview of the most frequently used payment services between 2015 and 2021, indicating that payment cards continue to be the prevailing retail payment instrument in the EU. This finding applies not only to the volume of transactions but also to their value and has also been confirmed in the responses of NCAs.

²¹ For an overview of all legal instruments issued by the EBA in support of PSD2, see landing page at: <https://www.eba.europa.eu/regulation-and-policy/payment-services-and-electronic-money>

Figure 14: Total number of payments per type of payment service, 2015 - 2021



Source: ECB

Note 1: EU changing composition (EU 28 + EU 27 from 2020);

Note 2: Data series has been discontinued by the source and will be replaced with a different series in future editions.

Emerging issues

79. Fraudulent transactions are still the most relevant issue reported by several NCAs for payment services and are further elaborated in Chapter 3 below. The level and types of fees levied by financial institutions in relation to payment services is the second most frequently mentioned issue by NCAs. A few other NCAs reported isolated issues arising from the lack or delay of payment execution, in particular for credit transfers, and reimbursements in case of operations unduly executed or not authorized, while some other NCAs still indicated the lack of transparency of contractual terms and conditions.
80. Furthermore, issues have been reported by a few NCAs in relation to the international bank account number (IBAN) discrimination, the use of virtual IBANs, as well as the impact of digitalization and retail branch closures on the accessibility of financial services for vulnerable categories of consumers, such as the elderly.
81. The data provided by NCAs and FIN-NET members, in turn, shows that the highest number of all complaints lodged in 2022 and 2023 concerned payment services, even though with a noticeable decrease from one year to the next. Unauthorized transactions was the most frequently mentioned reason for the complaints, followed fees and charges while the third ground related to issues concerning the execution of the transaction (either incorrect or late or issues with timing).

Regulatory and supervisory measures at national level

82. The national regulatory and supervisory measures adopted to address issues arising from fraud in retail payments are summarised in Chapter 1 above. In addition to these measures, a few NCAs indicated to have implemented actions related to other issues affecting the payment services, and did so by amending national rules to reinforce the information and communication technology (ICT) requirements as well as by adopting a national plan to encourage more secure transactions. In terms of supervisory actions, one NCA reported an initiative to inform consumers about the impact of retail branch closures, another monitored consumer costs associated with the most commonly used banking services, and another still reviewed the digitalization of payment services and the use of call centres.

Electronic money

Legal and regulatory framework in the EU

83. The Electronic Money Directive (EU 2009/110/EC) (EMD) lays down the rules for the pursuit of the activity of issuing electronic money (e-money) since the years 2010. In addition, several provisions of the PSD2 apply *mutatis mutandis* to electronic money institutions (EMIs).

Evolution and trends

84. E-money plays a significant role in a small number of jurisdictions, while in several other countries the relevance of this service is rather minimal, with some of them reporting fewer than 5 authorised EMIs in their respective jurisdiction. Only one authority indicated a high number of licenced e-money institutions and that some of these are gaining systemic relevance due to their transactions volume and clients number growth.

85. Several NCAs have reported an increasing trend for e-money since the last edition of the CTR, both in terms of number of transactions and volume. Only a few NCAs observed a downward trend limited to the absolute number of cards with e-money services and the number of transactions, while the total volume was not impacted in some cases. In one of these cases, the number of e-money institutions increased since 2015.

Emerging issues

86. The most frequently reported issue arising from e-money concerns the lack of clarity of terms and conditions applicable to e-money, particularly in relation to fees and charges levied with this service as well as rules regulating the safeguarding of funds.

87. A few other NCAs remarked the risks arising from consumers' unawareness of the service's features, as well as lack of clarity on the boundaries between e-money and crypto- assets. Finally, some other NCAs reported issues related to security and privacy concerns, including unauthorized transactions.

88. NCAs and FIN-NET members, in turn, reported very few cases for 2022 and 2023, which were primarily related to fraud with prepaid cards and disputed payments, followed by denial to access the account and poor provision of information.

Regulatory and supervisory measures at national level

89. NCAs reported regulatory measures being adopted to amend their national legal frameworks to new EU rules introduced by the Digital Operational Resilience Act (DORA), MiCAR, and the IPR, and many commented that the actions they took on payment services (summarized in paragraph 82 above) applied also to e-money.

Payment accounts

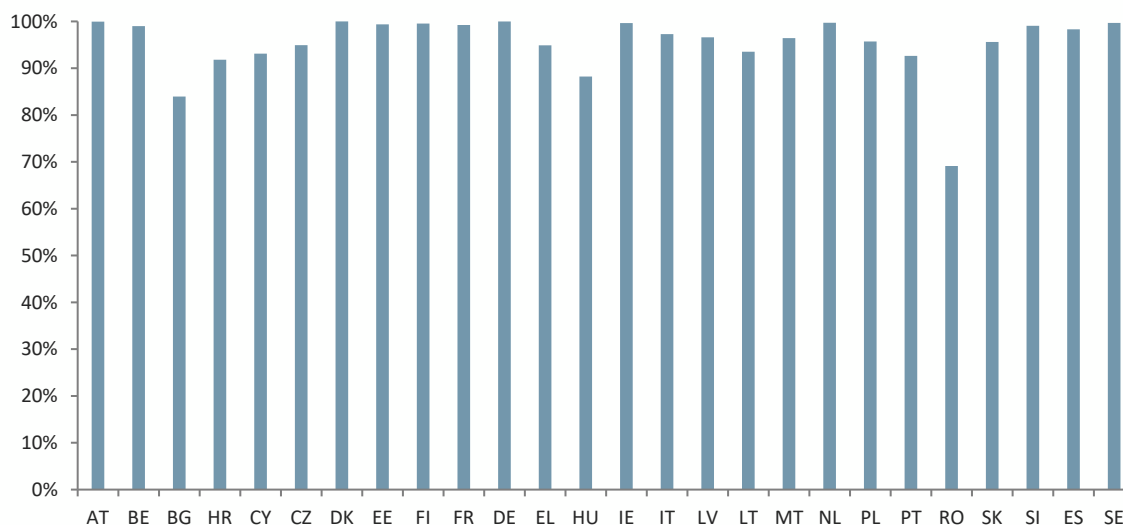
Legal and regulatory framework in the EU

90. The Payment Accounts Directive (PAD), applicable since 2016, lays down the main provisions concerning the transparency and comparability of fees charged to consumers on their payment accounts held within the EU, and the switching of payment accounts within a Member State, as well as rules aimed at enabling the opening of payment accounts with basic features. The EBA supported the implementation of the PAD by issuing Guidelines on national provisional lists of the most representative services linked to a payment account and subject to a fee (EBA/GL/2015/01), Regulatory Technical Standards (EBA/RTS/2017/04) and two sets of Implementing Technical Standards (ITS) (EBA/ITS/2017/03 and EBA/ITS/2017/04) to enhance transparency and comparison of payment account fees.

Evolution and trends

91. Payment accounts still play a key role for EU consumers in most countries as they are used for diverse purposes, i.e., managing daily activities, salaries, payments, and the safeguarding of funds.
92. Figure 15 below shows the percentage of the population aged 15 years or over holding a payment account in the EU as of 2021. This percentage ranges from 69% to 100% as account ownership differs significantly based on different factors, such as income groups and availability of accounts with non-bank regulated deposit-taking financial institutions, particularly mobile money service providers. Several NCAs (not shown in the Figure 15) reported an increasing trend in the number of payment accounts since the last edition of the CTR with few of them indicating a percentage of the population holding a payment account ranging between 80 and 90 that is using this product. Only a few NCAs indicated a decline in the past two years and reported as most common reasons the lack of need and lack of cash income.

Figure 15: Percentage of the population aged 15 years or over holding a payment account in the EU



Source: 2021 – World Bank Global Findex Report²²

93. In several jurisdictions, the shift to digitalisation boosted the possibility for consumers to open a payment account also remotely without the need of a branch, with faster and less expensive procedures.
94. Credit institutions remain the most important providers of payment accounts, whereby payment institutions (Pis) and EMIs offer this product only to a lesser extent.

Emerging issues

95. The lack of clarity and transparency in terms and conditions is the most relevant issue arising from payment accounts as reported by NCAs, including the level and number of fees which may also vary based on the residential address of the consumers.
96. The denial of access to payment accounts is also a rising concern for EU consumers as well as the unwarranted blocking or closure of the account. In this regard, several NCAs indicated that consumers either do not receive notice and information at all or the justifications provided by financial institutions to deny access to or block/terminate the account are not timely or clear. Further details are provided in Chapter 3 below.
97. A few NCAs reported that closure of retail branches and automated teller machines (ATMs) hinder consumers' access to financial services, and this is particularly so for certain categories, i.e., elderly, residents of rural areas.

²² The World Bank Global Findex's data is based not on private or public data but on consumer surveys. As the World Bank updates the indicators used in Figure 15 only every 3-4 years, but the EBA publishes its CTR on a biennial basis, the data displayed remained unchanged for several years.

98. NCAs and FIN-NET members, in turn, reported that payment accounts were the second most complained about product, with the most common reason related to the closing of bank accounts, followed by denial of access to bank accounts and unduly charged fees, in particular for maintenance of the account.

Regulatory and supervisory measures at national level

99. NCAs adopted several regulatory and supervisory measures to address the issues mentioned in the subsection above. When the measures concern denial of access to or blocking/closure of bank accounts, Chapter 3 provides a detailed summary. NCAs also undertook other initiatives, such as issuing "dear CEO" letters to financial institutions (FIs) aiming at improving accessibility to financial services, including information to consumers on the impact of retail banks branches and ATMs closures, visits to bank branches to verify the adequate staff knowledge of payment accounts and mystery shopping activities.

Deposits

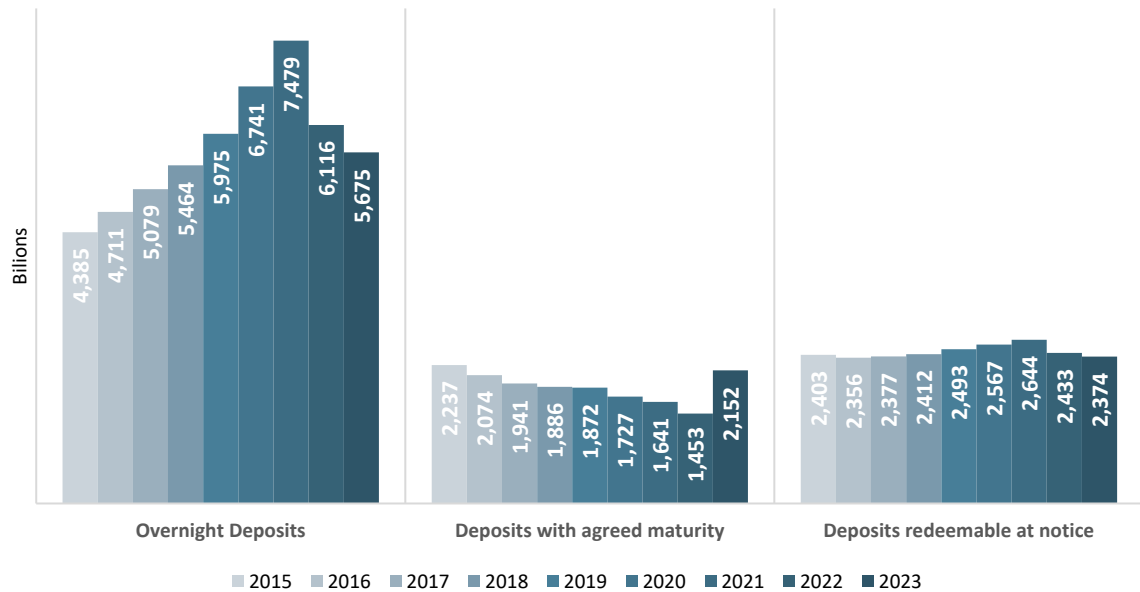
Legal and regulatory framework in the EU

100. In 2014, the recast Deposit Guarantee Schemes Directive (DGSD) came into force. It provides uniform deposit coverage of euro 100,000 and aims to provide reinforced protection for depositors, with quicker pay-outs and improved information. This directive also requires that all Deposit Guarantee Schemes (DGSs) be pre-funded to ensure that they will be able to fulfil their obligations towards depositors, and by doing so, increase confidence in the banking system. Furthermore, the Markets in Financial Instruments Regulation (EU No. 600/2014, MiFIR) mandates the EBA to monitor the market for the subset of deposits that are structured deposits (SDs) that are marketed, distributed or sold in the Union.
101. The EBA supported DGSD and MiFIR issuing several Technical Standards, Guidelines, Opinions and technical advice, such as on the intervention criteria for the temporary banning of SDs, the stress testing of deposit guarantee schemes and more.

Evolution and trends

102. Several NCAs reported that deposits are not only a very relevant product for consumers but also play a crucial role in the stability and growth of the economy. According to most NCAs, the protection of funds through deposit guarantee schemes bolstered consumers' confidence in the financial system and its security makes the product attractive.
103. Figure 16 below shows that overnight deposits held by households have grown significantly until 2021 and have since fallen sharply probably as a result of the increase in interest rates which also may have led consumers to withdraw more cash to mitigate the rise in services and goods costs.

Figure 16: Deposits held by households, 2015 - 2023 (billion euro, outstanding amounts)



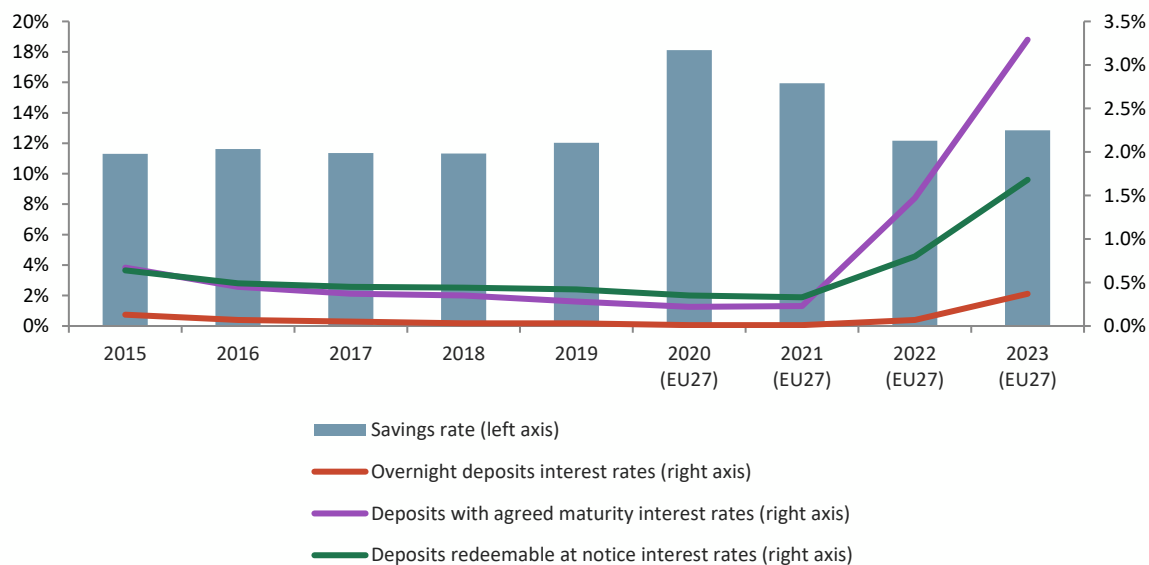
Source: ECB

Note: EU changing composition (EU 28 + EU 27 from 2020)

104. Despite the previous low interest rates environment, several NCAs reported a growth of deposits. Several NCAs reported that between 2023 and 2024 (not shown in Figure 16 above) consumers concluded a higher number of contracts for deposits with fixed term maturity probably as a result of the increase in interest rates and potential to earn a relevant yield.

105. Figure 17 below shows the households' saving rate from 2015 to 2023. The saving rate is the percentage of disposable income that a person or group of people save rather than spend on consumption. Figure 17 below also presents the interest rates for (i) overnight deposits; (ii) deposits redeemable at notice; and (iii) deposits with agreed maturity. As shown in the same Figure 17, the saving rate has been increasing moderately from 2016 until 2019, with a significant increase from 2020, possibly explained by the lockdown measures implemented during COVID-19, when people drastically reduced their daily expenses and leisure activities.

Figure 17: Saving rate and interest rates in the EU, 2015 - 2023



Source: ECB, Eurostat

Note: EU changing composition (EU 28 + EU 27 from 2020)

Emerging issues

106. Lack of clarity in the provision of pre-contractual information, including the level and number of fees levied by financial institutions and remuneration offered, is still high on the supervisory agenda of a few NCAs in relation to deposits. Several other issues have emerged across EU MSs such as the excessive length of the payout timeframes, fraudulent activities, closure of retail branches of local banks, and lack of knowledge from staff.

107. NCAs and FIN-NET members shared data on complaints received in 2022 and 2023 for deposits, showing this product as not being significantly controversial. In both years, the most common reason for complaints related to the cancellation/termination of the deposit account, followed by fees and charges levied on deposits, insufficient information provided, and the calculation of interest on the amount deposited.

Regulatory and supervisory measures at national level

108. To mitigate the issues reported above, NCAs mainly adopted supervisory measures, and these included a review of the information provided through advertising, with a focus on interest earned on the deposits, and educational initiatives to make consumers aware about the features of the national deposit protection fund.

Chapter 3: Topical issues

109. This chapter presents the topical issues most frequently identified by NCAs, FIN-NET members, consumer associations and EU industry associations, who were asked by the EBA to assign a score of 1 (not relevant), 2 (less relevant), 3 (quite relevant), 4 (relevant) and 5 (very relevant) to each issue. This chapter presents summary graphs that show the distribution of the scores attributed to each issue as well as the averages. Based on these averages, the EBA has identified the following three issues as being most relevant:

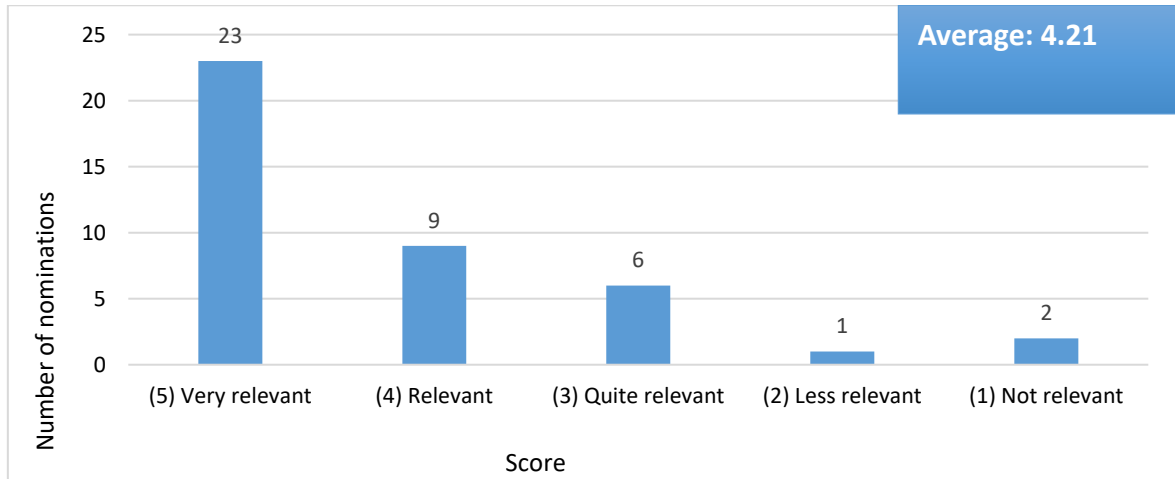
- Payment fraud;
- Indebtedness;
- Unwarranted de-risking.

110. For each of these issues, this chapter explains their respective relevance and presents the trends identified. The first two of these issues – payment fraud and indebtedness – already emerged as topical issues in the previous edition(s) of the CTR. The regulatory and supervisory measures adopted by NCAs since then to address these two issues are summarised separately in Chapter 1 above. It is not unexpected that topical issues re-emerge in editions of the report, as it takes time for regulatory and supervisory measures to have the desired effect.

Payment fraud

111. Payment fraud is the issue most frequently mentioned by respondents, and is a topic that emerged already in the CTR 2020/21 and the CTR 2022/23 as a similar but slightly wider issue. Figure 18 below shows the relevance attributed by NCAs and the other stakeholders in relation to this topical issue, which has an average score of 4.21 out of 5 based on the feedback received from 41 respondents out of 42. As shown in Figure 18 below, most of the respondents (23 out of 41) highlighted that payment fraud is very relevant in their respective.

Figure 18: Distribution and average of scores attributed by respondents to the topical issue of payment fraud



112. The high relevance attributed to this issue is possibly a result of fraudsters adapting their techniques in response to conventional attack vectors being closed down as a result of the SCA requirements imposed by EU law and other measures implemented by the industry. The new fraud type most frequently mentioned include social engineering.²³ Fraud rates, in turn, vary significantly across jurisdictions and for type of payment services. Several respondents indicated that credit transfer is the most affected payment service in terms of the total value of fraudulent transactions, while card-based transactions are the ones mostly impacted in terms of volume of fraudulent transactions.
113. Respondents identified three ways in which consumers are impacted by payment fraud: (i) an increase in so-called APP fraud, where the payer is manipulated into making a payment to the fraudster, and this is so regardless of the national legal and regulatory framework applicable at national level; (ii) unauthorised transactions; and, (iii) applicability of the relevant liability rules.
114. To perpetrate an APP fraud, fraudsters manipulate the victims into making a payment. Fraudsters often leverage on fears and time pressure to lure consumers into executing real time payments, even through mobile payment solutions, or providing personal financial data.
115. In some instances, fraudsters impersonate a known and trusted third party (banks, parcel delivery companies, local police forces, local post companies) so that consumers are lured into providing sensitive information by SMS and email scams. Other respondents reported cases of impersonation mixed with technical scams (including vishing and smishing) where the victims for example receive Whatsapp messages allegedly sent by a close relative urging to transfer money by clicking on a link included in the message, and instances where fraudsters forged the identity of the payee resulting in a modification of the payment order and purchase of crypto-assets.

²³ Social engineering indicates those techniques used by criminals to exploit a person's trust in order to make the payment services users authorising the payment orders issued.

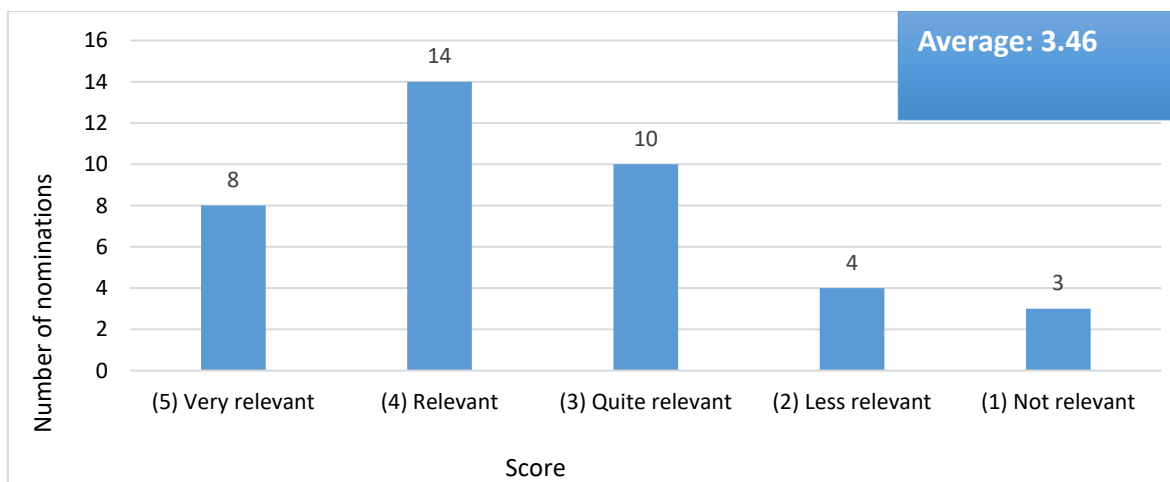
116. As pointed out by several respondents, the above-mentioned fraud techniques are largely independent from technical security measures taken by the PSPs and usually leverage on information gathered about the consumer via social networks. Most of the APP fraud are carried out by consumers authenticating the payment request.
117. Unauthorised transactions are another way how many respondents observed the issue as materialising. These are cases where fraudsters adopt several techniques, further explained below, to lure consumers into making payment transactions, with an emerging trend reported by some respondents concerning the role of Artificial Intelligence (AI) in enabling personalised scams.
118. Many respondents indicated phishing to be the technique most frequently used by fraudsters, i.e. cases where the victims receive an email or an SMS that appears to be sent from a legitimate sender asking to take urgent actions by clicking on a link. As a result of the victims' action, fraudsters install a software token or a manipulated mobile banking application on the device of the victim and hence acquire access to personal and sensitive data. Other scam techniques reported include:
- *vishing*, where the scam happens over the phone, voice email, or calls with messages offering consumers fake opportunities, such as a fake job post;
 - *spoofing*, which include forging email addresses or creating fake websites;
 - *smishing*, where the fraud happens via sms or other types of text messages;
 - *clones of PSPs*, which cover cases where the fraudsters pretend to be an authorised entity.
119. A few respondents reported a small number of cases of identity theft, subscription traps, and other fraudulent mandates to initiate transactions, pharming, through which fraudsters deceive and redirect users to malicious websites, and installation of spyware.
120. Several respondents reported a rise of a new type of scam at the intersection of payment services and credit products / investment services. In these cases, fraudsters first gain access to the victims' credit card data either through a scam technique or by illicitly gaining access to the victims' mobile banking identifiers, only to then either apply for a personal loan using said data or make an investment, including in crypto assets.
121. Finally, most consumer associations and several NCAs reported as a third way through which the issue of payment fraud materialises as the impact of the application of liability rules. These respondents observed that a large share of fraud losses is borne by the consumers, rather than the PSPs, and that this may be explained by the broad interpretation in some MSs of the notion of 'gross negligence'.
122. PSPs therefore exhibit different practices and propensities to reimburse the victims of fraud. For example, as already observed in the EBA Opinion on payment fraud, some PSPs

consider all SCA authenticated transactions as authorised, even in case of social engineering fraud, and to refuse reimbursement of customers in such cases, as they consider that the limitation of liability of the payer in Article 74 PDS2 does not apply. One NCA mentioned that the national banking association adopted a voluntary reimbursement policy for victims of fraud.

Indebtedness

123. Indebtedness emerged as the second most relevant issue for EU consumers, following similar appearances in the previous two CTRs. Figure 19 below shows the relevance attributed to indebtedness by 39 NCAs and other stakeholders, with an average score of 3.46 out of 5. As shown in Figure 19 below, many of the respondents indicated that this issue is either very relevant (8 out of 19) or relevant in their jurisdiction.

Figure 19: Distribution and average of scores attributed by respondents to the topical issue of indebtedness



124. Several respondents indicated that in the last two years the indebtedness level increased in their jurisdictions, that this coincided with the rise of interest rates and inflation that started at the end of 2022, and that this is still negatively impacting those borrowers who had opted for a variable interest rate credit product, as the increased costs of the credit and daily life drastically reduced household income. On the contrary, other respondents reported a stably low or even decreasing level of indebtedness among the population.

125. A few respondents reported an increase of the level of indebtedness in consumer credit products rather than residential mortgages. This is the case particularly for personal loans, revolving credit cards, BNPL, and other types of small, fast and short-term credit, as the following paragraphs explain while identifying the main forms through which this issue manifested.

126. NCAs and the other stakeholders have identified four main ways in which the issue of indebtedness materialised. These are, in decreasing order of relevance, (i) the rise in BNPLs and other types of small, fast and short-term credit; (ii) the risks arising from the inadequate

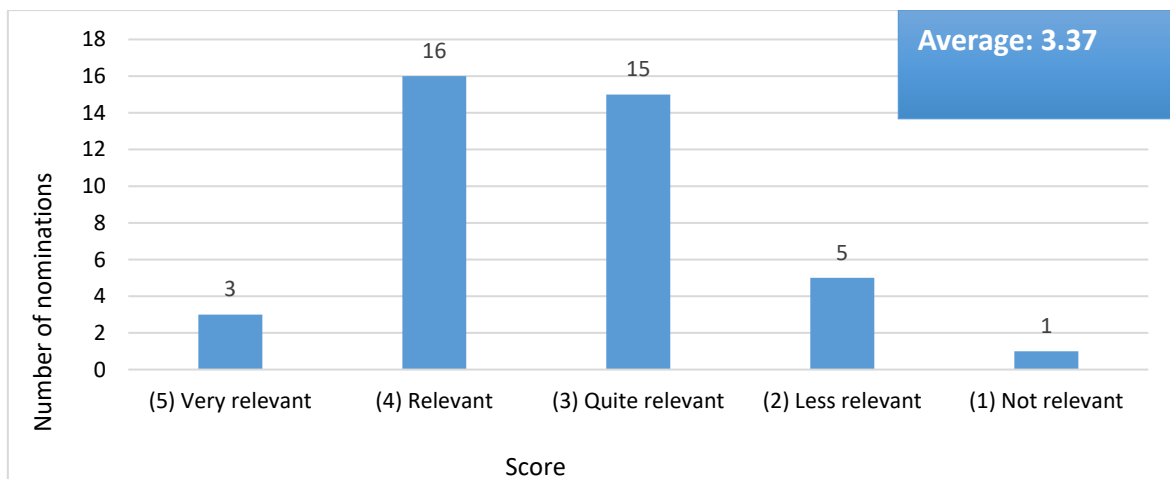
creditworthiness assessment practices, in particular of NBLs; (iii) the inadequate forbearance measures and treatment of consumers in repayment difficulties, and, (iv) the impact of the lack of or insufficient transparency in the provision of information by lenders.

127. As most relevant way for indebtedness to materialise, most respondents identified the rise of BNPLs and other types of small, fast and short terms credit. These are types of short-term and unsecured credit that allow consumers to purchase goods now and pay for them at a future date, either in a single payment or through multiple instalments. Typically, BNPL lenders do not charge interest on the credit made available, but in most cases, charge consumers administration fees, including for late or missed payments.
128. Several respondents identified a number of risks arising from BNPLs and other types of lower value, fast and short-term credit products, starting from a regulatory perimeter that remains unclear, as well as the aggressive advertising carried out by lenders and the easy accessibility of BNPL products. Of particular concern among respondents is the targeting of the clientele by BNPL lenders, i.e., vulnerable consumers (elderly, low-income, low financial literacy, young people, non-native speakers), which is combined with consumers' limited understanding of the product features and resultant risks to which they are exposed. In many instances, consumers access multiple, small amounts of credit, and they fail to realise that the borrowed amounts build up to an unaffordable larger debt, creating a tendency of 'debt habituation and accumulation'.
129. Lenders' inadequate CWA practices, especially for consumer credits, are reported by respondents as a key driver of indebtedness, which results in the consumers taking up or accumulating excessive amounts of credit. This trend appears to be particularly the case in some jurisdictions when the credit is advertised and granted through digital channels or by some types of NBLs as identified at national level, possibly because this type of lenders is subject to less stringent regulatory requirements, or because their level of compliance with applicable requirements is insufficient.
130. Several respondents reported another way in which the issue of indebtedness materialises, which is the poor practices of lenders when dealing with consumers in repayment difficulties. Mostly, respondents indicated that the forbearance measures offered to consumers are not fully compliant with regulatory requirements, fail to be tailored to the personal and financial circumstances of the borrower, and/or are inadequately communicated to borrowers in repayment difficulties.
131. Finally, several respondents indicated an inadequate level of transparency and disclosure of pre-contractual information, particularly concerning the calculation of interest rates, as contributory factor to indebtedness. Respondents indicated concerns in relation to the quality, quantity and timing of information provided to prospective borrowers. Information was found to be often incomplete, not sufficiently clear, inaccurate or difficult to understand, all of which may impact consumers' understanding of risks and features of credit products, in particular when these are offered through online / digital channels, where all the difficulties mentioned appear to be amplified.

Unwarranted de-risking

132. Challenges with consumers' ability to access bank accounts, i.e., denial to open a bank account and denial to access an already existing own account, were identified in the CTR 2020/21 where a large number of respondents reported that account providers were following a 'de-risking' policy, i.e., refusal to access a bank account due to AML/CFT risks. These challenges remerge as the last of the three topical issues in this report. Figure 20 below shows the relevance attributed by NCAs and the other stakeholders in relation to this topical issue, which has an average score of 3.37 out of 5 based on the feedback received from 40 respondents out of 42. Most of the respondents (16 out of 40) highlighted that the issue is relevant.

Figure 20: Distribution and average of scores attributed by respondents to the topical issue of unwarranted de-risking



133. All respondents stressed the need for a fair access to basic payment accounts, in view of its contributory role to financial inclusion and as a precondition for EU residents to fully participate in economic and social life. This is particularly true for specific categories of vulnerable consumers, i.e., migrants, refugees, asylum seekers, homeless people, cross-border workers, individuals with poor financial histories, and survivors of human trafficking or modern slavery.

134. That said, it is also important that risks of financial crime, money laundering and terrorism financing are effectively managed by financial institutions. To achieve this objective, financial institutions have to put in place and maintain policies and procedures to comply with their legal obligations in accordance with Article 8 of the Anti-Money Laundering Directive (AMLD), Directive (EU) 2015/849. These policies and procedures aim at identifying and managing the risks that they may be used for money laundering and terrorist financing (ML/TF) purposes.

135. Where a financial institution takes a decision to refuse to enter into, or to terminate, business relationships or to refuse to carry out certain transactions of particular categories of customers instead of managing the risks associated therewith, this is referred to as 'de-risking'. While decisions not to establish or to end a business relationship, or not to carry out a

transaction, may be in line with an institution's risk appetite, or legal obligations such as those in Article 14(4) of the AMLD, de-risking of entire categories of customers, without due consideration of individual customers' risk profiles, can be unwarranted and may be a sign of ineffective risk management. These practices can ultimately harm consumers, be detrimental to the fight against ML/TF as well as to the achievement of EU's objectives, where legitimate customers who are individuals can become financially excluded, thus affecting market and consumer protection. In 2023, the EBA issued Guidelines on policies and controls for the effective management of ML/TF risks when providing access to financial services (EBA/GL/2023/04) to address this point.²⁴ It also amended its Guidelines on ML/TF risk factors to include specific provisions on granting access by Not-for-Profit Organisations to financial services.

136. NCAs and other respondents identified three ways in which this third and final topical issue materializes, i.e., (i) difficulties in the opening, closing, and servicing of bank accounts purportedly as a result of AML/CFT requirements; (ii) lack of (prompt) communication from the provider about the denial/suspension/closure of the account and reasons thereof, unless such disclosure would be contrary to, *inter alia*, provisions of the AMLD; and (iii) closure of payment accounts without thorough assessment by the financial institutions and/or due to change in commercial policy from financial institutions.
137. The opening, closing, and servicing of bank accounts purportedly as a result of AML/CFT requirements was mentioned most frequently by respondents, many of which reported that this predominantly affects consumers with difficulties in submitting identification documents or other information requested during the 'Customer Due Diligence' (CDD) onboarding process, such as a permanent residential address. Other respondents highlighted what they perceived to be disproportionated request for information, together with excessive fees and lengthy processes, as main difficulties encountered by consumers applying for a bank account, with financial institutions justifying their requests often as compliance with the anti-money laundering/countering of financing terrorism, (AML/CFT) rules.
138. The lack of (prompt) communication from the provider about the denial/suspension/closure of the account and reasons thereof is the second most relevant way mentioned by respondents in which unwarranted de-risking negatively impacts consumers who are often unaware of the institution's decision, with institutions often reported to unilaterally terminate the account without informing the consumers, or doing so but not in a timely manner, leaving consumers with no possibility to have the file reviewed.
139. Finally, a few NCAs and other respondents observed a trend of closure of payment accounts without thorough assessment from financial institutions and/or due to change in commercial policy from financial institutions.

Regulatory and supervisory measures

²⁴ Final Report – Guidelines on policies and controls for the effective management of money laundering and terrorist financing (ML/TF) risks when providing access to financial services (EBA/GL/2023/04), available [here](#).

140. In order to address the ways described above through which unwarranted de-risking materialises, NCAs have implemented measures of various kinds, often as a compliance mechanism with the EBA GLs on de-risking and amended GLs on ML/TF risk factors. Starting with regulatory measures, a few NCAs introduced measures designed to improve the accessibility to payment accounts and a reduction of costs of this product. In one case, the national regulatory framework requires credit institutions to detect financially fragile consumers and to offer them basic services at a special price, while in another case, the rules prevent de-risking of entire categories of customers. In other instances, NCAs have issued national guidelines for banks on de-risking and financial inclusion, or published common good practice criteria for financial institutions when blocking or terminating relationships with clients.
141. With regards to supervisory measures, NCAs reported several initiatives, starting from the assessment of financial institutions' application of the de-risking rules especially to high-risk consumers and their impact on financial exclusion. Some of these actions were followed by the publication of best practices identified among financial institutions and recommendations to address shortcomings identified. Other authorities carried out on-site inspections on banks to assess how they enter into, and maintain, relationships with consumers such as non-governmental organisations (NGOs), while adhering to AML/CFT obligations.
142. Finally, some other NCAs focused their initiatives on the accessibility to, and marketing, of basic payment accounts while disseminating information about this product among immigrants and refugees, in cooperation with local police forces and other stakeholders.

Conclusions

143. The 2024/25 edition identifies three issues that impact EU consumers most: ‘payment fraud’, ‘indebtedness’, and ‘unwarranted de-risking’. Payment fraud is still the most significant issue for EU consumers as a result of new types of fraud, such as APP fraud, where the payer is manipulated into making a payment to the fraudster. Indebtedness emerges as the second most relevant issue, coinciding with the rise of interest rates and inflation that started at the end of 2022. The rise of the so called ‘BNPLs’ and other types of small, fast, accessible and short-term credit is how the issue most frequently manifests itself, followed by inadequate credit worthiness assessment practices of lenders and poor disclosure of pre-contractual information. Finally, the report identifies unwarranted de-risking as the third most relevant issue, which manifests itself in consumers having challenges in accessing payment accounts, i.e., denial of access to payment accounts and/or suspension/termination of contracts. These trends affect mostly vulnerable categories, i.e., migrants, refugees, asylum seekers, homeless people, cross-border workers, and individuals with poor financial histories.

144. In terms of trends and issues identified for the retail banking products and services under the EBA’s remit on consumer protection, this new edition of the CTR concludes that:

- Residential mortgages and consumer credit have steadily increased in volume in recent years. Borrowers’ repayment capability appears to be the main issue arising for both products, together with poor lending practices.
- While the use of digital payment services continues to grow, e-money sees a decrease in relevance in many countries. Fraud and lack of transparency of contractual terms and conditions and fees are the most common issues.
- Deposits and payment accounts are still significant for most consumers, and their use has consistently increased in recent years. Lack of transparency in provision of information mostly at pre-contractual stage is the most relevant issue.

145. In the coming months, the EBA will assess which actions to take to address the issues identified and mitigate detriment that payment fraud, indebtedness and unwarranted de-risking cause to EU consumers. In particular, under payment fraud, the EBA may support the implementation of the rules emanating from the upcoming PSD3/PSR, should Level 1 text foresee so. On indebtedness, the EBA will monitor the impact that the economic factors will have on residential mortgages and credit products, and propose actions accordingly should EU consumers’ repayment conditions worsen. Finally, with regards to unwarranted de-risking, the EBA may take initiatives to assess how financial institutions apply the rules emanating from EBA AML/CFT related Guidelines in order to ensure a fair access to financial services to all EU consumers.

List of References

Figure 1: Residential mortgages as a percentage of loans to households, 2015 - 2024 (EU27)

Euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.A20.A.1.U2.2250.Z01.E

Series key: BSI.M.*.N.A.A20.A.1.U*.2250.Z01.E

Non-euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.A20.A.1.U6.2250.Z01.E

Series key: BSI.M.*.N.A.A20.A.1.U6.2250.Z01.E

Mortgage lending

Euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.A22.A.1.U2.2250.Z01.E

Series key: BSI.M.*.N.A.A22.A.1.U2.2250.Z01.E

Non-euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.A22.A.1.U6.2250.Z01.E

Series key: BSI.M.*.N.A.A22.A.1.U6.2250.Z01.E

Figure 2: Annualised rate of lending for house purchases in the EU, 2010 – 2024

<https://data.ecb.europa.eu/search-results?searchTerm=MIR.M.U2.B.A2C.AM.R.A.2250.EUR.N>

Series key: MIR.M.U2.B.A2C.AM.R.A.2250.EUR.N

Figure 3: Lending for house-purchases, 2015 - 2024 (in euro) – EU27

<https://data.ecb.europa.eu/search-results?searchTerm=MIR.M.U2.B.A2C.AM.R.A.2250.EUR.N>

Series key: MIR.M.U2.B.A2C.AM.R.A.2250.EUR.N

Figure 4: Share of new loans with variable rate by country, March 2019 - March 2024 (EU27)

https://data.ecb.europa.eu/search-results?searchTerm=RAI.M.*.SVLPHH.EUR.MIR.Z

Series key: RAI.M.*.SVLPHH.EUR.MIR.Z

Figure 5: Percentage of arrears on mortgage or rent payments, 2015 - 2023 (EU27)

<https://ec.europa.eu/eurostat/databrowser/bookmark/dababf43-8eca-48c0-99e6-f5232d2347fe?lang=en>

Series key: ilc_mdcs06

Figure 6: Share of loans with forbearance measures over all household loans, 2015 - 2024 (EU/EEA) (MC1)

EUCLID (European Banking Authority)

Figure 7: Share of loans with forbearance measures over all household loans, June 2023 – June 2024, by country (MC1)

EBA supervisory reporting data

Figure 8: Share of NPLs collateralised by immovable property over all loans collateralised by immovable property, 2015 - 2024 (EU/EEA) (MC2)

EBA supervisory reporting data

Figure 9: Share of NPLs collateralised by immovable property over all loans collateralised by immovable property, June 2023 – June 2024, by country (MC2))

EBA supervisory reporting data

Figure 10: Outstanding amount and interest rate of consumer credit in the EU across time, 2015 - 2023 (in euro)

Euro area countries

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.A21.A.1.U2.2250.Z01.E

Series key: BSI.M.*.N.A.A21.A.1.U2.2250.Z01.E

Non-euro area countries

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.A21.A.1.U6.2250.Z01.E

Series key: BSI.M.*.N.A.A21.A.1.U6.2250.Z01.E

Other lending

Euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.A23.A.1.U2.2250.Z01.E

Series key: BSI.M.*.N.A.A23.A.1.U2.2250.Z01.E

Non-euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.A23.A.1.U6.2250.Z01.E

Series key: BSI.M.*.N.A.A21.A.1.U6.2250.Z01.E

Interest rate

<https://data.ecb.europa.eu/search-results?searchTerm=MIR.M.U2.B.A25.A.R.A.2250.EUR.O>

Series key: MIR.M.U2.B.A25.A.R.A.2250.EUR.O

Figure 11: Percentage of arrears on loan repayments for consumer credit, 2015 – 2023 (EU27)

<https://ec.europa.eu/eurostat/databrowser/bookmark/0d744952-c380-4bd9-976f-ae41f446eb86?lang=en>

Series key: ilc_mdcs08

Figure 12: Share of NPLs from credit for consumption over all credit for consumption, 2015 - 2024, (EU/EEA) (OCL1)

EBA supervisory reporting data

Figure 13: Share of NPLs from credit for consumption over all credit for consumption, June 2023 – June 2024, by country (OCL1)

EBA supervisory reporting data

Figure 14: Total number of payments per type of payment service, 2015 - 2021

https://sdw.ecb.europa.eu/browseTable.do?org.apache.struts.taglib.html.TOKEN=af66286374c2210580a3c72582359952&df=true&MAX_DOWNLOAD_SERIES=500&DATASET=0&org.apache.struts.taglib.html.TOKEN=b61091dc7fd529f593156f1b2612504b&org.apache.struts.taglib.html.TOKEN=1d0cfd36ae5b23b27bf01b7cab00d698&REF_AREA.93=D0&node=bbn1387&SERIES_MAX_NUM=50&SERIES_KEY=169.PSS.A.D0.F000.I1A.Z00Z.NT.X0.20.Z0Z.Z&SERIES_KEY=169.PSS.A.D0.F000.I31.Z00Z.NT.X0.20.Z0Z.Z&SERIES_KEY=169.PSS.A.D0.F000.I34.Z00Z.NT.X0.20.Z0Z.Z&SERIES_KEY=169.PSS.A.D0.F000.I35.Z00Z.NT.X0.20.Z0Z.Z&SERIES_KEY=169.PSS.A.D0.F000.I37.Z00Z.NT.X0.20.Z0Z.Z&SERIES_KEY=169.PSS.A.D0.F000.IEM.Z00Z.NT.X0.20.Z0Z.Z&SERIES_KEY_checkall=on&legendPub=published&activeTab=PSS&PSS_INSTRUMENT.93=I1A&PSS_INSTRUMENT.93=I31&PSS_INSTRUMENT.93=I34&PSS_INSTRUMENT.93=I35&PSS_INSTRUMENT.93=I37&PSS_INSTRUMENT.93=IEM&start=01-01-2015&end=31-12-2021&submitOptions.x=0&submitOptions.y=0&trans=N&q=&type=

Series key: PSS.A.D0.F000.I1A.Z00Z.NT.X0.20.Z0Z.Z

Figure 15: Percentage of the population aged 15 years or over holding a payment account in the EU

<https://globalindex.worldbank.org/sites/globalindex/files/2018-08/Global%20Index%20Database.xlsx>

Figure 16: Deposits held by households, 2015-2023 (billion euro, outstanding amounts)

Overnight deposits

Euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.L21.A.1.U2.2250.Z01.E

Series key: BSI.M.*.N.A.L21.A.1.U2.2250.Z01.E

Non-euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.L21.A.1.U6.2250.Z01.E

Series key: BSI.M.*.N.A.L21.A.1.U6.2250.Z01.E

Deposits with agreed maturity

Euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.L22.A.1.U2.2250.Z01.E

Series key: BSI.M.*.N.A.L22.A.1.U2.2250.Z01.E

Non-euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.L22.*.1.U6.2250.Z01.E Series

key: BSI.M.*.N.A.L22.*.1.U6.2250.Z01.E

Deposits redeemable at notice vis-a-vis domestic households

Euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.L23.A.1.U2.2250.Z01.E Series

key: BSI.M.*.N.A.L23.A.1.U2.2250.Z01.E

Non-euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.L23.*.1.U6.2250.Z01.E Series

key: BSI.M.*.N.A.L23.*.1.U6.2250.Z01.E

Repurchase agreements

Euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.L24.A.1.U2.2250.Z01.E Series

key: BSI.M.*.N.A.L24.A.1.U2.2250.Z01.E

Non-euro area countries:

https://data.ecb.europa.eu/search-results?searchTerm=BSI.M.*.N.A.L24.A.1.U6.2250.Z01.E Series

key: BSI.M.*.N.A.L24.A.1.U6.2250.Z01.E

Figure 17: Saving rate and interest rates in the EU, 2015 - 2023

Bank interest rates - overnight deposits from households

<https://data.ecb.europa.eu/search-results?searchTerm=MIR.M.U2.B.L21.A.R.A.2250.EUR.N>

Series key: MIR.M.U2.B.L21.A.R.A.2250.EUR.N

Deposits with agreed maturity

<https://data.ecb.europa.eu/search-results?searchTerm=MIR.M.U2.B.L22.A.R.A.2250.EUR.N>Data

Series key: MIR.M.U2.B.L22.A.R.A.2250.EUR.N

Deposits redeemable at notice

<https://data.ecb.europa.eu/search-results?searchTerm=MIR.M.U2.B.L23.A.R.A.2250.EUR.N>

Series key: MIR.M.U2.B.L23.A.R.A.2250.EUR.N

Households saving rate

<https://ec.europa.eu/eurostat/databrowser/bookmark/f604ad04-32e7-432c-ac44-94160e0863ff?lang=en>

Series name: gross saving rate of households

Series key: tec00131



Tour Europlaza, 20 avenue André Prothin CS 30154
92927 Paris La Défense CEDEX, FRANCE
Tel. +33 1 86 52 70 00

E-mail: info@eba.europa.eu

<https://eba.europa.eu>