

## Cybersalon submission to CBDC Consultation document June 2023

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# Central Bank Digital Currencies

Bring public money into the digital age

## Introduction

The debate around CBDCs cannot be understood without reference to recent events, technological change and the formidable challenges on the horizon. A pivotal moment was the 2008 Great Financial Crisis (GFC), a seismic shock that revealed profound vulnerabilities in the global economy and national governance. The banking sector,

poor government oversight, and a pervasive belief in the west in self-correcting markets and a hands-off state were all collectively culpable.

The fallout disproportionately affected ordinary citizens who had placed their trust in financial and state institutions. Rescue measures, including austerity and quantitative easing, yielded mixed outcomes. While quantitative easing saved the global economy from catastrophe, it widened wealth disparities by inflating asset prices. Meanwhile, austerity constricted public spending, amplifying inequality and suppressing demand and economic growth, thus deepening societal fissures.

This environment gave rise to populism, with its attractive rhetoric of straightforward solutions and blame directed at the establishment. All this happened in the context of digital and social media's rise, with its potential to bypass traditional gatekeepers. This democratization of information dissemination, while empowering, also catalyzed societal divisions, where unchecked beliefs amplify and extremes flourish. Simultaneously, it nurtured more skepticism towards elites, further eroded trust and established institutions, as their authority and control over narratives were challenged.

One of positive results of the great financial crisis is that money has been made plain what anthropologists and theorists of money have been saying for a sometime and summarised by Stefan Eich in *The Currency of Politics*: Namely that money is not a thing, but an idea. It is a form of collective belief. It has always been a form of circulating debt or credit accepted within a certain community, and as such it depends on trust. So while we might use objects, tokens, database entries to represent money, that is not money. It is the collective idea behind it that is money.

Money is therefor also not a neutral technology, but always a social and political one. That is to say, there is not only a power in having money, but also in being able to govern and create it. The question therefor is who has this power and in whose benefit is this power exercised.

We saw the power of money in action during the GFC. How it misuse enriched some and precipitated a crisis, and how authorities used it to prevent systemic collapse. The upshot of all this is that it was made plain that money and banking is never completely private, even the money created by private banks. Money is always tethered to the state who backstops it. It is often in the interest of those that seeks to subvert money's public role for private gain to pretend this is not the case.

So it follows that here too, as in other domains, states are fundamentally important institutions, that provide the platform for this belief and trust that money requires to thrive. States themselves thrive on the technology of money: Their ability to mobilise debt has been a major motive force of modernity and progress. And we believe that to ensure this money power benefits the broad public, the state should do so under democratic control.

This is why in our approach outlined below, though important, what matters is not the technology or laws we propose. But rather how they enable the strengthening of this collective belief in money. Or to put a finer point on it, how we govern and create money makes for a more capable state and ultimately a flourishing society.

## How we got here

### Cash is in decline and arresting this requires government intervention

Accepting cash as a payment method has storage, accounting and security implications, which are costly. Neither do the public find it as convenient as electronic money. So it's important to note that if the government did nothing, firms would increasingly give up accepting cash, and the public will increasingly not use it, as they have done over the last decade. In such a scenario, cash, the only sovereign issued money (that is to say, money that

is a liability of the Bank of England, whose ability to meet its obligations is limitless) the public currently has access to, will play an ever-dwindling role.

Today government regulation and informal pressure on private banks ensure a basic level of bank branches and automated cash machines. This is to provide a service to those that still prefer physical banking and cash. If the government does not intervene in this way, cash use will decline even faster. It also means that the debate about CBDCs is not simply about whether the government should do more. This debate is about what it should be doing.

### Banking is not in stable equilibrium

Because money is a form of credit, banking depends on trust. Recent events has shown that though they may minimise the worst outcomes, simply reinstating and maintaining macro prudential banking regulations from pre-1990s will not prevent recurring banking crises. Digital technologies favour economies of scale, also in banking, meaning bigger banks that are too big to fail. This is exacerbated by the ease and speed with which customers can move their money, social media viral contagion and capped state deposit insurance.

The result of fewer and bigger banks for the same deposit base is that an ever-increasing amount of banks' deposits are not covered by government guarantees. Meaning that even prudent financial citizens and businesses will find it harder to spread deposit risk over many banks. All this taken together means an increasing risk of systemic banks runs that no society can afford.

Guarding against it means that the taxpayer and the public at large will remain the guarantors of the private risk taking by the banking sector, effectively forced to guarantee all deposits.

And even if there are no crises the public will pay more for this stability through higher banking fees. This state of affairs has had commentators like Matt Klein stating the obvious: "Banks are speculative investment funds grafted on top of critical infrastructure."

Meanwhile stablecoins, mercifully mostly ringfenced from and (yet) too small to damage the real economy, unsurprisingly turned out to be the killer app of the blockchain ecosystem. This is precisely because they provide a link to an indispensable public good, public money. It was the prospect of one stablecoin achieving massive scale galvanised policymakers into taking action.

### The threat of Big Tech

Central Bank Digital Currencies (CBDCs) has been mooted in the context of the disappearance of cash, and the preservation of money as a public good for over a decade. Creating a CBDC is often confused with the state implementing its own distributed ledger (DLT) or blockchain technology.

But this is not the key differentiator. What really matters is that it is (1) electronic money (2) that is a liability of the state, whose ability to create money is limitless, and how this underpins trust in the whole system. The driving force that catapulted CBDCs to the forefront of central banks' agendas was the prospect of a globally significant stablecoin, specifically Meta's (then still called Facebook) announcement of Libra.

The announcement immediately drew attention to the potential implications of a gigantic stablecoin, introduced by a major tech company and backed by a reserve of various currencies. The focus was on how such a development could impact the stability of the global financial system, the execution of monetary policy, and the concept of national financial sovereignty.

It could, if it worked as intended, and because of the needs of its reserve, lead to a shortage of cash like instruments driving up commercial banks' funding costs. More importantly it could reduce national central banks' ability to set monetary policy through interest rates. Since the reserve consisted of a basket of currencies its value would not have been stable, but it had no

central bank to govern it. And Libra would have provided an easy vehicle for "dollarisation" of countries with weak and unstable currencies.

China's rise, and its measures to reign in its technology giants, set a further example to the west. And with China's experimentation with CBDCs, a further fear emerged, namely that the Digital Yuan will allow the Chinese to conduct currency imperialism. And so before the most recent banking crisis, stablecoins and interstate rivalry became the top two reasons CBDC's became policy makers' focus.

### The question of innovation

One should draw a distinction between financial innovation, and financialisation. We note in general that finance and banking is a crucial part of modern economies. A well-functioning financial sector is vital for economic growth and stability, as it facilitates saving, investment, credit formation and risk management, without which growth isn't possible. Yet too much finance can have the opposite effect, crowding out productive investment in the real economy – that is financialisation. It is characterized by the expansion of financial markets, the growth of financial transactions relative to other economic activities, and the increased importance of financial strategies in businesses and households. While the UK has one of the biggest financial sectors as a percentage of GDP in the world, its capital markets are poor at funding productive investment compared to the US. Clearly the UK could do with some financial innovation and not more financialisation.

One of the arguments made for DLTs is that its adoption could lead to financial innovation. The ability to build money that could execute so-called "smart contracts" automatically once certain conditions are met is often mentioned in this regard. But centralised systems can also have programmable money. What makes DLT fundamentally different is its distributed nature. Yet we can point to more than a decade of significant investment in DLT with little productive financial innovation to show for it. We can point to its technical inefficiency. Still who is to say something useful is not just around the corner?

Answering critics about the lack of DLT "killer apps" Marc Andreessen, like many venture capitalists and entrepreneurs, often uses words like "opportunity" and "potential" to characterize the future-oriented nature of investments in technology sectors, including DLT. So the inherent uncertainty in these new and rapidly-evolving technologies doesn't negate their potential to create significant value or have a profound impact on society in the future. But that raises the question: Why is the unknowable possibilities of new technology to boost innovation rarely promoted by those that say they are pro-innovation when it comes to the provision of money as a public good? For example, a recent UK parliamentary report on CBDC (Central bank digital currencies: a solution in search of a problem?) lauds the importance of innovation, but also finds there is no current good reason to have a CBDC. So we argue that the UK's Economic Affairs Committee is wrong. There are already many concrete reasons to introduce a CBDC, which we have outlined above and summarise below. But we should also be open, like Andreessen, to the possibility that more opportunities for innovation will only be apparent once we have CBDC as a public platform. As we move into an era with a new appreciation of the role of an "Entrepreneurial State" - to borrow from Mariana Mazzucato's phrase - is there a good reason why the state cannot provide this public good in digital form?

### Why not rather relaunch the Girobank (and other ideas)?

The Girobank was a public sector bank in the United Kingdom, which was established by the Post Office as National Giro in 1968. The idea behind Girobank was to provide banking services that were more accessible to individuals and businesses, using the Post Office's extensive network across the country.

### The advantages that the Girobank had:

**Accessibility:** Because Girobank was associated with the Post Office, customers could access banking services at numerous locations throughout the UK, including in rural areas where there may not have been traditional bank branches.

**Service to the Underserved:** Girobank provided banking services to customers who might not have been able to get an account with a traditional bank, such as those with poor credit or low incomes.

**Simplicity:** Girobank offered simple, straightforward financial products. This was different from many other banks, which often had complicated fee structures and terms.

**Public Trust:** As a part of the Post Office, a highly trusted public institution, Girobank enjoyed a high degree of public confidence, which is an important advantage in banking.

**Commercial Banking Services:** Girobank was instrumental in offering banking services to commercial entities. They provided services to local authorities and other public sector bodies.

### Could the Girobank work now?

Two of the reasons the Girobank could have cheaper services no longer applies.

**Economies of Scale:** With the extensive Post Office network, Girobank could reach a vast number of customers across the UK. This large scale could enable it to spread costs over a larger customer base, potentially allowing for lower fees. The Post Office Network is smaller today.

**Low Overhead Costs:** The use of the existing Post Office infrastructure likely reduced the overhead costs that would typically be associated with running a separate banking network.

Lower overhead costs could enable lower customer fees. While today the Post Office itself is not privatised, many of its branches are operated on a franchise or agency basis by private individuals or companies. This could push up operating costs.

While relaunching the Girobank could do some of what a CBDC does, namely cheaper public access to the financial system, it will not help with the issue of deposit insurance. Neither would it solve declining use of cash. And neither would it be an effective guardian against monetary destabilisation. And it will not provide a similar potential platform for innovation.

A public owned retail bank is not the same as having an electronic money form that's a liability of the state.

But the question of a CBDC and a Girobank does not have to be either or. One could have both.

### Other cash like ideas:

Today UK law enforcement agencies may obtain access to banking data in the course of criminal investigations. Similarly, financial institutions are required to report any suspicions of money laundering or terrorism financing, which may involve sharing customer data with authorities.

They may be baseless fears but many express the angst that the disappearance of cash could jeopardise freedom by increase state surveillance since there will be no untraceable option. It is important to bring the public along on the CBDC journey. Even if not used that much, the availability of an untraceable alternative could help assuage these doubts, by playing the role cash has.

On March 28, 2022, in the US, Rep. Stephen Lynch, Chair of the House Committee on Financial Services' Task Force on Financial Technology, introduced The Electronic Currency and Secure Hardware (ECASH) Act. We think the technology this act enables, could go some way to alleviate state surveillance fears by giving the public another option.

There are a variety of potential forms such devices may take, which is why the ECASH Act directs the U.S. Treasury to experiment with multiple pilot designs simultaneously. However,

the most common forms, and thus most likely to be adopted initially, are a payments card and a secured chip environment on a phone.

In essence, this technology represents a bearer instrument — a legal obligation to pay whoever has legitimate physical possession of it. This instrument is distributed directly to the public and can be owned, held, and used directly by them. It enables instantaneous, direct, peer-to-peer, offline transactions that don't require additional approval or validation by the United States Government or any other third-party payment processing intermediary.

Not only is this technology interoperable with existing financial institution systems, payment providers, and other public payments programs, it's also designed to emulate the anonymity and privacy-respecting features of physical cash to the maximum extent practical. This includes being regulated similarly to physical currency and not being subject to third-party exemptions to a reasonable expectation of privacy — a concept that's central in US law relating to search and seizure.

Historically in the US, under the "third-party doctrine," the law has considered individuals to not have a reasonable expectation of privacy for information willingly provided to third parties, such as banks or internet service providers. The ECASH Act aims to provide an electronic payment option that's exempt from such exemptions, thus preserving the privacy norms associated with physical cash.

One significant advantage of e-cash technology is that it facilitates direct payments between cards without the need for point-of-sale (POS) devices. Moreover, it extends the usability of cash to situations where physical currency is impractical or not accepted. For example, how would one send paper money to pay for an eBay purchase? With this technology, the advantages of cash are preserved, expanded, and modernized, helping to assuage public fears about the disappearance of physical currency.

Because e-cash technology can be used for online transactions and easy to transport unlike cash, and is anonymous, e-cash can extend the volume and use cases for money laundering and other illegal activities, as well as be used to dollarize economies. Therefore we would suggest limiting the amount of e-cash that can be carried on any particular card.

## The arguments for a CBDC

From the discussion above we can deduce the following reasons to have a CBDC.

1. To not force the public to effectively loan their money to private entities to be able to participate in the modern digital economy.
2. To maintain the anchoring of the system, currently provided by cash.
3. To facilitate financial inclusion.
4. To protect against monetary destabilisation.
5. To maintain a political community's ability to govern money inside their community, monetary sovereignty in short.
6. To protect against the process of credit creation's propensity to cause private gains and public losses.
7. To reduce costs.
8. To facilitate innovation.

## The potential drawbacks to a CBDC

Throughout this piece we have mentioned some of the possible negatives a CBDC could introduce. We think there are two that bears more in-depth discussion.

### Credit creation

Reflecting on the potential drawbacks of a CBDC, it is crucial to delve deeper into two key areas, namely credit creation and privacy.



The process of credit creation and dissolution plays a vital role in stabilizing the economy if managed effectively. It is in this process that banks play a useful social role. But commercial banks significantly rely on deposits and savings to fund their loans, especially now that interest rates are higher. However, the advent of CBDCs as the most secure form of money (being a liability of the central bank) raises a question: would there be any incentive for people to hold current accounts if CBDCs were available?

One possibility could be that commercial banks might have to offer higher interest rates than CBDC deposits held by the central bank, which would be good for the public. And quite a departure from the current system where they are forced to effectively loan their money to commercial banks, in order to participate in the modern economy. Central banks might decide to provide interest-free accounts, which could be beneficial for commercial banks. Though since central bank remits are the overall health of the economy they should not be forced to do so. Furthermore, banks will probably have to procure a larger share of their funding from money markets. This could well elevate the overall cost of credit within the economy — and impinge on bank profits. Yet, in our view, this trade-off may be a necessary cost. Deposit insurance will no longer be required, which would also reduce bank costs. And banks could go under without the state having to save deposit holders.

The idea of central banks offering credit themselves might also surface, but we argue that it is rife with complications. Firstly, it may result in a conflict of interest. A central bank, responsible for the overall economy. Today, when it does provide loans to commercial banks it is for the orderly functioning of the credit system.

If it provided loans on an individual bases, when controlling rates, it might want to avoid defaults on these loans by maintaining low rates. When times are good it might be tempted to maximize returns by charging higher rates. The central bank's main focus should remain monetary policy and the wider economy.

Secondly, credit creation involves risk assessment, requiring an understanding of individuals and institutions financial lives. Expecting a central bank to familiarize itself with and monitor the financial status of its customers would significantly expand its role, leading to potential intrusions into private citizens' lives. Hence, we strongly advocate that central banks should not offer loans directly to individuals or on an individual basis, aligning with current norms. This is where reviving the Girobank might have a role.

### Privacy

Lastly, we address the issue of privacy more broadly. Beyond the aforementioned credit extension, there is a broader concern about state-level access to citizen transaction data if a CBDC is launched. However, we believe that this problem can be mitigated by stringent legal measures. Laws should expressly forbid the state from analysing citizens' financial behaviour at an individual level. Thus, privacy concerns can be effectively managed while navigating the transformative path towards CBDC implementation.

## Designing a CBDC

A CBDC could be implemented in several ways. Technological, legal, and institutional choices will have far-reaching effects on a CBDC's capabilities, strengths, and weaknesses. The devil is in the detail.

Few disagree that in wholesale banking, a CBDC makes sense. The existing wholesale system could be viewed as an early already existing form of wholesale CBDC. But we think that that if designed correctly, a CBDC also makes sense in “retail” banking, provided it is accompanied by legislation and measures to reassure the public and build trust. What follows below is a discussion of how design decisions could influence a CBDC, and is largely based on the excellent research on this topic by the *Bank for International Settlements* (BIS).

## **One tier (direct) vs two tier**

According to the "direct CBDC" model, the CBDC represents a direct claim on the central bank, which keeps a record of all balances and updates it on a regular basis.

As it does away with intermediaries, direct CBDC is attractive for its simplicity. Having to provide deposit insurance would be a thing of the past. However, this may entail compromises in terms of the payment system's reliability, speed and efficiency. Today's credit card networks are an example of a private sector operating and building technical capacity on this scale.

But it is possible for public authorities to do similar. After sanctions were implemented against Russia in 2014, it created its own state back payments networked Mir, managed and operated by the Russian National Card Payment System (NSPK). This has allowed Russian cards inside the country to continue processing transactions in spite of Visa and Mastercard blocking transactions after the invasion of Ukraine in 2022. It should also be noted that if a central bank built the architecture of the system in such a way whereby payment service providers (PSPs) could still offer payments services and wallets, via central bank APIs, some of the technical risk and capacity needs of the central bank would diminish.

Some argue that a direct CBDC might be less appealing to consumers than current retail payment systems even if a central bank built the necessary technological capability. A challenge with electronic payments is that to be always on, they have to deal with connectivity outages or offline payments, which involves intermediaries like commercial banks or merchants taking risks. As a result of the relationship with the client - based on known business practices such as KYC, but more importantly, transaction and account data - the intermediary can make provision for such risks.

Payment networks (like Visa or Mastercard) have developed certain rules and protocols to deal with this. Most payment cards have an offline limit set by the issuer (usually a bank), above which transactions must go online for approval. If a terminal is offline, it can pre-approve transactions up to this limit based on the card's information. The limit is typically set to balance the convenience of allowing offline transactions with the risk of potential fraud or non-payment.

In order to provide this service, a central bank would have to expand its operations beyond existing mandates. It would also have to assume responsibility for KYC (if they are running an account-based system [see below] they would have to do this anyway), transaction data analysis and customer due diligence. If however the reason for a CBDC is partly to help financial inclusion, it could decline to take on this risk, yet excluded customers may still prefer direct CBDC over having no bank account. In fact, we think most customers will still prefer to have access to direct CBDC as an alternative.

## **Two-tier**

There are two forms of two tier CBDC, "hybrid" and "indirect".

### **Hybrid**

The "hybrid CBDC" model, is an intermediate solution providing for direct claims on the central bank while allowing intermediaries to handle payments. In this model, a direct claim on the central bank is combined with a private sector messaging layer. Both token- and account-based systems (discussed below) could work in this way.

As part of the hybrid model, a key element is the legal framework underlying direct claims on the central bank, i.e. the CBDC is not on the balance sheet of payment service providers (PSPs) and therefore not affected by bankruptcy. This way, in the event of PSP (potentially a bank) insolvency, consumers' CBDC holdings would not be exposed to claims by the PSP's creditors (usually shareholders). So again, the need for deposit insurance goes away.



The legal framework should also allow for portability in bulk, ie give the central bank the power to switch retail customer relationships from a failing PSP to a fully functional one. The second key element is the technical capability to enable the portability of holdings. Since the requirement is to sustain payments when one intermediary is under technical stress, the central bank must have the technical capability to restore retail balances. It thus retains a copy of all retail CBDC holdings, allowing it to transfer retail CBDC holdings from one PSP to another in the event of a technical failure.

The hybrid CBDC would have both advantages and disadvantages vis-à-vis the fully indirect or direct CBDC architectures. As an intermediate solution, it might offer better resilience than the indirect CBDC, but at the cost of a more complex to operate infrastructure for the central bank. As the central bank does not directly interact with retail users, it can concentrate on a limited number of core processes, while intermediaries handle other services including instant payment confirmation. We are not convinced that direct or the hybrid form of CBDC are too complex for a central bank.

### **Indirect**

Indirect CBDC is the simple requirement to fully back payment accounts with reserves at the central bank. It could be considered a narrow payment bank or a “rigid stable coin”.

Besides offering the convenience of today's systems based on intermediaries, the indirect CBDC also relieves the central bank of the responsibility for dispute resolution, KYC and related services. But the downside is that the central bank keeps no record of individual claims (only the intermediaries do, whereas the central bank records only wholesale holdings) nor is there any cash-like direct proof of the claim. Thus, the central bank cannot honour claims from consumers without information from the intermediary. If the intermediary is under stress, determining the legitimate owner might involve a potentially lengthy and costly legal process with an uncertain outcome. This model's regulatory and supervisory issues, as well as those pertaining to deposit insurance, are hence similar to those of today's system. Whereas full backing would likely mean that such episodes occur infrequently, the recent example of Wirecard underlines that these concerns have to be taken seriously, nevertheless. The downside of the intermediated CBDC architecture is that the central bank needs to honour claims that it has no record of. It would thus have to rely on the integrity and availability of records kept by third parties. Consequently, to safeguard cash-like credibility, PSPs would need close supervision capable to ensure at all times that the wholesale holdings they communicate to the central bank indeed add up to the sum of all retail accounts.

### **Account-based vs token-based CBDC**

As already noted, initially expressed with regard to global stablecoins, a concern with token based digital currencies in general (as Libra would have been) is that they may threaten countries' monetary sovereignty by displacing their domestic currencies without their states consent. Because they allow anonymity, non-citizens and citizens alike can use token based digital currencies anywhere they are accepted.

But if this displacement is pervasive, this will have negative consequences in the country of the currency being replaced: The country becomes dependent on the monetary policy of the displacing currency, which in all likelihood will not align with its own economic needs. Eventually new digital currency areas may emerge based on digital platform empires rather than legal jurisdictions.

Does the same concern apply token based CBDCs? Most definitely, and because of ease of use, and potential to access wherever an internet connection is, the risk is far greater than with cash. Even ordinary citizens of countries whose CBDCs are doing the displacing are impacted. As demand for a currency rises, higher currency values ensue, cause trade deficits and may impact manufacturing and lead to a loss of blue-collar jobs.

With an account-based design for CBDCs, based on identification, both the issuing central bank and the central bank of a receiving country would need to agree to cross-border use.

### **Distributed ledger vs centralised**

A major criticism of distributed ledger technologies (DLTs) like Bitcoin is their performance. DLTs have lower transaction throughput than conventional architectures because of the overhead needed to operate a consensus mechanism. The likely volume of data throughput prevents current DLT from being used for direct CBDC (which keeps track of all balances and updates them with every transaction), except in very small jurisdictions. Enterprise versions of DLT might also be feasible for the hybrid CBDC architecture, where the central bank does not handle payments, as discussed below.

There is no clear advantage to either a DLT-based or a conventional centralised system when it comes to robustness. There is simply a difference in the vulnerabilities. In conventional architectures, the main vulnerability is the failure of the top node, for example through a targeted hacking attack. DLT's primary vulnerability is its consensus mechanism, which is susceptible to denial-of-service attacks, for example.

The costs and benefits of using DLT must be carefully weighed. External validators are essentially given the authority to adjust central bank balance sheet claims, which is advantageous only if one trusts these networks to operate more reliably than the central bank itself.

## **RECOMMENDATIONS**

We believe that Central Bank Digital Currency (CBDC) plays a vital role in modernizing our financial systems by offering the public an optimized and robust form of public money. It propels the state into the 21st century by enhancing the distribution and capabilities of this public asset. With more advanced tools to helping manage our public resources, especially monetary policy, a competent state can not only bolster our economies but also foster greater trust.

In the light of the above discussion these are our recommendations:

- To introduce a free retail CBDC, to which all British subjects and companies have a right.
- That the CBDC be direct, but with API's, so that 3<sup>rd</sup> parties can build wallets and other applications on top of it.
- That it be account based, and not token based, centralised and not DLT.
- That there be no limit to the amount an account holder can hold with the BoE.
- That the law regarding the BoE recommit its purpose to monetary stability, and expressly prohibits the extension of its role to providing credit to individuals or businesses outside of this role.
- That the Act of Parliament that institutes CBDC expressly forbids the untargeted monitoring of accounts except for terrorism, money laundering related crimes (as is currently the case), or the targeted surveillance of an account, without a reasonable suspicion of criminal activity. The analysis of data on the aggregate for better monetary policy management will be encouraged.
- That simultaneously anonymous bearer instrument e-cash like technology is launched in the UK. E-cash hardware should not be able to hold more money than a value similar to what would be considered reasonable with respect to cash, for example £500.

