

DIGITAL ECONOMY LAW FOR DIGITAL AND ELECTRONIC PAYMENTS IS PUBLISHED

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Excecutive Summary:

The new Digital Economy Law for Digital and Electronic Payments aims to promote the adoption of digital payment methods in Mexico, strengthen financial inclusion, and reduce reliance on cash. The Law establishes obligations for government authorities and private entities regarding the implementation of digital payment methods, introduces digital identification mechanisms, and grants financial authorities additional powers to encourage their use.

It also provides for the possibility of designating certain sectors and activities in which digital payments will be mandatory, making it essential to monitor the forthcoming secondary regulations that will define the scope and requirements for its implementation.

On November 4th, 2026, the Decree issuing the Digital Economy Law for Digital and Electronic Payments *(Ley de Economía Digital para Pagos Digitales y Electrónicos)* (hereinafter, the "Law") was published in the Official Gazette of the Federation.

The foregoing takes place in a context in which, according to the 2024 National Financial Inclusion Survey *(Encuesta Nacional de Inclusión Financiera)*, most everyday transactions in Mexico are still settled in cash, even though the country has infrastructure such as the Interbank Electronic Payment System (SPEI), payment collection schemes through QR codes and mobile phone numbers (CoDi and DiMo), and account levels with simplified requirements that allow remote account opening. According to the statement of legislative intent *(exposición de motivos)* of the bill that gave rise to the Law, the gap lies not in the infrastructure itself but in its adoption, and the purpose of the Law is to close the gap between the available infrastructure and its effective use, so that anyone is able to pay digitally.

I. PURPOSE

The purpose of the Law is to promote the adoption and implementation of Electronic and Digital Means of Payment (the "EDMP"), in order to close the gap between the available infrastructure and its effective use, so that anyone is able to pay digitally. The Law further seeks to foster financial inclusion, contribute to the formalization of micro and small businesses, and facilitate the generation of a transaction history that enables access to formal credit.

The adoption of EDMP is intended to have a positive impact on people's lives and on business operations. The main benefits highlighted by the Law include:

(i) Increased efficiency and security, and reduced transaction costs, since digital payments are made in real time and are accompanied by an electronic receipt;
(ii) Facilitating immediate and remote payments and transfers, without being subject to business hours or a

specific location;
(iii) The development of a financial history and credit profiling and, consequently, access to other financial products;
(iv) Lowering barriers to participation in the formal economy, reducing the risk associated with handling cash, as well as increasing sales opportunities and access to other financial services.

The adoption of digital payments produces, without additional administrative effort, a verifiable record that constitutes a transaction history useful for demonstrating payment capacity before financial institutions.

II.TRUST MECHANISMS FOR FINANCIAL SERVICES

Title Two of the Law provides for two trust mechanisms: the Digital CURP *(Digital Unique Population Registry Code)* and the Citizen Digital File *(Expediente Digital Ciudadano).*

The Digital CURP, governed by the General Population Law *(Ley General de Población)*, may be accepted as a valid identification mechanism for entering into financial services agreements, in addition to the other mechanisms currently valid for such purpose, while the Citizen Digital File, governed by the National Law to Eliminate Bureaucratic Procedures *(Ley Nacional para Eliminar Trámites Burocráticos)*, may be used for the consultation or use of users' documents or information, who may, at any time, request from the Entities the information contained therein. Likewise, all documents contained in the file shall have the same legal effect as physical documents issued in accordance with the applicable regulations in force.

III. IMPLEMENTATION OF THE MEANS OF PAYMENT

The Law sets forth the following obligations for the three levels of government, as well as for private parties that carry out acts of commerce on a regular and professional basis:

(i) Enabling the infrastructure necessary to receive EDMP for the completion of administrative procedures and services;
(ii) Informing EDMP users that such EDMP have been enabled;
(iii) Adopting measures to address circumstances that prevent their acceptance;
(iv) Implementing any other action to promote the use of EDMP in the administrative procedures, goods and services they offer.

The Ministry of Finance and Public Credit ("SHCP") shall have the authority to determine the strategic sectors and relevant activities in which EDMP may be the only means of payment. The SHCP has a term of 15 business days following the publication of the Law in the Official Gazette of the Federation to publish such determination. Likewise, the competent authorities shall issue the administrative provisions establishing the conditions, requirements, obligations and operation for the receipt of EDMP as the sole means of payment in such sectors.

Although the Law seeks the implementation of EDMP as the sole form of payment in certain sectors and activities, it provides for the possibility of payment by check or cash in the event of a contingency.

With respect to the three levels of government, the Law expressly provides that they will not receive additional resources to implement the technology and infrastructure necessary to accept EDMP as means of payment; therefore, such expenditures must be covered by their approved budgets.

VI. ADOPTION AND USE: ROLE OF BANCO DE MÉXICO AND THE ENTITIES

Banco de México ("Banxico") may, among other things:

(i) Expand the operating levels of sight deposit accounts, in order to create alternatives that adapt to people's needs and encourage the use of EDMP;
(ii) Implement tools or programs to facilitate the use of electronic transfers;
(iii) Issue provisions aimed at standardizing the user experience of the Entities' applications; and
(iv) Issue general provisions *(disposiciones de carácter general)*, jointly with the National Banking and Securities Commission, the supervision of which shall be the responsibility of such Commission, so that the Entities also allow the receipt of EDMP payments through QR codes.

For their part, the Entities shall carry out, among others, the following actions:

(i) Promote the financial inclusion of the population;

(ii) Facilitate the granting of credit, financing and loans through digital means.

V. ADMINISTRATIVE PROCEDURES AND TECHNOLOGY SOLUTIONS

The Law provides that the three levels of government shall be responsible for adopting and implementing Technology Solutions, such as the Digital CURP, the Citizen Digital File for individuals and legal entities *(personas físicas y morales)*, the Ventanilla Digital Nacional de Inversiones and the Plataforma de Establecimientos Mercantiles.

VI. TRANSITORY ARTICLES

The Decree issuing the Law shall enter into force on the day following its publication in the Official Gazette of the Federation.

It is important to note that, although the Law is already in force, it will be relevant to monitor the secondary regulations to be issued by the SHCP, Banxico and the National Banking and Securities Commission, within the terms and under the conditions set forth in the transitory articles, as well as the determination of the strategic sectors and relevant activities in which EDMP will be the sole means of payment.

Sergio Chagoya
Partner
schagoya@s-s.mx

Diego Ostos
Partner
dostos@s-s.mx

Esteban Soto
Associate
esteban.soto@s-s.mx

Iñaki Barrera
Associate
inaki.barrera@s-s.mx