

ERPB Secretariat

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Assessment of follow-up on ERPB statements, positions and recommendations

1. Introduction & summary

According to the mandate of the Euro Retail Payments Board (ERPB) its work includes “formulating common positions, guidance, statements and strategic views on the way forward”¹. It is also stipulated that the ERPB follows up on identified barriers to integration through three main ways: a) establishing working groups b) delegation of work priorities to external groups or organisations and c) through the identification and acknowledgment of already existing and working market groups.

The aim of this document is to provide an overview on the follow-up of ERPB statements, positions and recommendations. The overview serves the purpose of keeping track at the ERPB level on whether ERPB statements, positions and recommendations are followed up with action by relevant stakeholders and, if not, to enable the ERPB to discuss possible remedies. A similar overview is provided for each meetings of the ERPB.

Based on the assessment by the Secretariat there is no need for reconsidering past ERPB statements or recommendations. Overall the follow-up by various stakeholders is satisfactory. While some items will be discussed in the June 2015 ERPB meeting (e.g. instant payments and cards standardisation), there are a few other items (related to SCT post migration and to pan-European electronic mandates) which may require special attention and/or additional steps from the ERPB Secretariat and the relevant stakeholders. Regarding the latter items, the ERPB Secretariat will liaise with the relevant stakeholders and agree with them on the concrete steps to be taken. The Secretariat will continue to monitor developments related to all items and will report back to the next meeting of the ERPB (in November 2015).

¹ Article 2, paragraph 1

2. Methodology of the assessment

To ensure a better and more user-friendly overview of the status of the follow-up on past ERPB statements, recommendations and positions it is proposed to apply a simple traffic light system with four grades:

- **Red:** means that no significant efforts have been done or there are significant obstacles faced by the relevant stakeholders preventing progress on the given recommendation or issue. Hence, more attention and efforts are needed in the future and the recommendation or issue requires further attention at the ERPB level.
- **Yellow:** means that efforts have been made on the given recommendation or issue by the relevant stakeholders but further currently not planned efforts may be needed or there is a risk that obstacles may arise with regard to further progress on the recommendation or issue. The recommendation or issue could require further attention at the ERPB level in the future.
- **Green:** means that all necessary efforts have been made by the relevant stakeholders on the given recommendation or issue and the issue at hand is on track to be fully resolved in the near future. Barring unexpected developments there is no need for further attention to the matter at the ERPB level.
- **Blue:** means that due to the necessary efforts made by the relevant stakeholders the given recommendation or issue has been fully followed up / relevant stakeholders are in full compliance with the given recommendation and the issue is to be treated as closed.

These traffic lights are complemented by textual remarks / assessment of the follow-up on the given issue or recommendation to provide more detailed information and to underpin the traffic light assessment.

3. Overall assessment of the follow-up and status of ERPB recommendations, stances and statements

Overall, ERPB recommendations and statements made in the past two meetings of the ERPB are actively being followed up by relevant stakeholders and have either been completed or are on track to be completed in the near future. This means that the majority of traffic light assessments given to the recommendations and other ERPB stances are set to blue or green. In the below we highlight the few issues that require further attention from the ERPB and or the relevant stakeholders. For the time being there are no items in the follow-up lists which would require reconsideration by the ERPB.

3.1 Open items to be highlighted from the May 18, 2014 meeting of the ERPB

The only item not considered closed from the issues discussed in the May 2014 ERPB meeting is that of *the alternative (no refund) SEPA direct debit scheme*. The ERPB concluded in May 2014 that such a scheme could be launched if there was a clear legal background supporting this and set additional requirements for such a scheme. The review of the Payment Services Directive (PSD2) includes the

revision of the regulation of the refund right of the payer in direct debit schemes. Therefore the legal background is clearly subject to a change at EU level. However, as the PSD2 has formally not been finalised yet there is no full certainty at this point on the future relevant legal environment.

3.2 Open items to be highlighted from the December 1, 2014 meeting of the ERPB

The ERPB adopted 20 recommendations related to SCT-SDD post migration issues and 7 recommendations related to pan-European electronic mandates for SDD in its meeting on the 1 December 2014. The majority of these recommendations have received due attention from the relevant stakeholders and have been followed-up properly (either having been closed or on track to be closed in the near future, see section 4). However, there are a few of these which requires further attention from the relevant stakeholders or on which no follow-up has been made yet:

SCT-SDD post migration issues

The recommendation on *investigating ways to solve the issue of differing national legal requirements related to the use of SDD R-transaction reason codes by debtor banks (ERPB/2014/rec11)* is marked as yellow. The European Commission has discussed this with Member State representatives in the EU Forum of National SEPA Fora and it had to conclude that this issue is difficult as it requires change in national laws related to data privacy. However, two relevant legal proposals (proposals for a General Data Protection Regulation and the Data Protection Directive for Police and Criminal Justice Authorities) are currently being negotiated by the European Parliament and Council with a chance of progress being made on this issue.

Furthermore, although the EPC has had detailed internal discussions on the *clarification of the consequences of mandate amendment scenarios (ERPB/2014/rec20)* they indicated that they do not see it as the role of the scheme owner to publish a paper on this. Hence, the item is marked as yellow and there are further discussions needed between the ERPB Secretariat and the EPC on this.

Pan-European electronic mandates

The only recommendation marked as red is the one addressing *electronic mandate service providers recommending that they be open for interoperability and whenever feasible to make use of the model described in Annex VII of the SDD Scheme Rulebooks (ERPB/2014/rec26)*. Furthermore, although substantial efforts have been made by the ECB and the EPC to obtain *country specific information (legal framework and debtor bank practice) on signature methods accepted to sign electronic mandates (ERPB/2014/rec21)*, the EPC is of the view that due to the differing practices the surveys found a clarification paper is not warranted on this issue. The item is marked as yellow and the ECB will further discuss the next steps on this with the EPC.

Pan-European instant payments in euro

The ERPB agreed on its stance on instant payments and invited the supply side of the industry to prepare an assessment of the issues related to pan-European instant payment services (with the active involvement of the EPC and involving the demand side). The EPC set up a (EPC-only) task force to

perform this task and prepared a report to the June 2015 ERPB meeting. Concrete next steps and further involvement of the supply and demand-side stakeholders may be needed to fully meet the expectation of the ERPB. This will be discussed under the relevant item of the agenda of the June 2015 ERPB meeting.

Technical standards related to payment cards

As invited by the ERPB in December 2014, the Cards Stakeholders Group (CSG) performed a detailed stock-taking of the EU cards market and presents its findings in the June 2015 ERPB meeting. Any further measures depend on the outcome of the discussion on the relevant item on agenda of the June 2015 meeting of the ERPB.



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4. Detailed assessment of follow-up on ERPB statements, positions and recommendations²

Number	Issue / recommendation	Addressees / relevant stakeholders	Remark	Assessment of follow-up
Remaining open issues from the May 2014 meeting of the ERPB				
ERPB/2014/sta0	Alternative (no-refund) consumer direct debit scheme: The ERPB agreed: i) to recommend to the European Commission and the EU legislators that they consider a legal solution to clarify the refund rights in the context of a review of the Payment Services Directive and ii) that such an alternative direct debit scheme in SEPA could only be launched once the review of the Payment Services Directive was complete and thus provided a clear legal background to allow for this	EU legislators, European PSPs	The review of the Payment Services Directive (PSD2) will most likely change the regulation of refund rights at EU level but it has not been finalised yet.	Yellow
Remaining open issues from the December 2014 meeting of the ERPB				
ERPB/2014/sta28	Pan-European instant payments in euro: The ERPB invited the supply side of the industry (in close cooperation with the demand side and with the active involvement of the European Payments Council as a potential scheme developer) to make an assessment of the issues related to pan-European instant payment solutions in euro to be presented at the ERPB meeting in June 2015.	Supply side of the industry (with the active involvement by the EPC)	The EPC Taskforce created to prepare the assessment of the issues from the supply-side perspective has delivered a report to the ERPB	Green
ERPB/2014/sta29	The ERPB invited the Cards Stakeholders Group (CSG) <ul style="list-style-type: none"> ▪ to complete its stock taking exercise of market initiatives developing technical standards (so called implementation specifications) by June 2015 and ▪ to formulate a procedure for the assessment of 	Cards Stakeholders Group (CSG)	The CSG has delivered a detailed report on its stock-taking of the implementation of technical standards in the EU payment cards market as well as a procedure for assessing the conformity with those standards to the June 2015 meeting of	Green

² Based on feedback from the relevant (addressed) stakeholders

	conformity of those technical standards with the SEPA Cards Standardisation Volume by June 2015.		the ERPB	
ERPB recommendations on SCT-SDD post migration issues made in December 2014				
ERPB/2014/rec1	The ERPB supports the publication and use of the EPC's current customer-to-bank Implementation Guidelines (IGs) by all market participants. The ERPB recommends making the EPC's customer-to-bank IGs mandatory in the next EPC SEPA rulebook change management cycle.	The EPC's Scheme End-User Forum	The EPC will review obstacles in the current C2B IGs versus the XSD schemas ³ and provide an approach on how a scheme participant would be obliged to accept at least but not exclusively C2B SEPA payment message files based on the EPC's C2B SEPA scheme IGs. The aim is to come to mandatory EPC C2B IGs becoming effective ⁴ as of November 2017 after a public consultation in 2016. The proposed messages in scope for the future mandatory C2B IGs for SCT, SDD Core and SDD B2B are pain.001, pain.008 and pain.007. The EPC will ask for a position from the Scheme End-User Forum (SEUF) and the EPC Scheme Technical Forum (ESTF) in the 3 rd quarter of 2015.	Green
ERPB/2014/rec2	The ERPB supports and recommends making the EPC's bank-to-customer IGs mandatory in the next EPC SEPA rulebook change management cycle. The ERPB recommends consulting the EPC's Scheme End-User Forum about the appropriate bank-to-customer message(s) for future mandatory EPC bank-to-customer IGs and proposing a set of mandatory EPC IGs in the bank-to-customer space.	EPC & the EPC's Scheme End-User Forum	As there are no dedicated SEPA statements but only SEPA messages, at this stage the only possibility for the EPC is to update the mapping document EPC188-09 Recommendations on customer reporting of SCT and SDD . The updated mapping document can be published together with the EPC rulebook versions that will be effective as of November 2017. The EPC will ask for a position from the SEUF and the ESTF in the 3 rd quarter of 2015.	Green
ERPB/2014/rec3	It is recommended to follow up with EU Member States and take appropriate action to ensure the enforcement of EU law related to payment accessibility as stipulated in Article 9, Regulation EU (No) 260/2012.	European Commission and Member States	The subject of IBAN discrimination has been addressed at each meeting of the EU SEPA Forum and CEGBPI since December 2014. In these meetings Member States were informed that <ul style="list-style-type: none"> • The Commission receives complaints on a near daily basis in relation to IBAN discrimination, tries to resolve the cases if possible and keeps track of Member States actions; • The designated competent authorities should be competent for Payment Services Providers (PSPs) and Payment Services Users (PSUs). This was necessary as a number of Member States misinterpreted Regulation 260/2012 and did not designate competent authorities with responsibility for payment 	Green

³ XSD (XML Schema Definition), specifies how to formally describe the elements in an Extensible Markup Language (XML) file. XSD is used to express a set of rules to which a XML file must conform in order to be considered "valid" according to that schema.

⁴ Subject to the outcome of the public consultation

			<p>service users; and</p> <ul style="list-style-type: none"> • A number of infringement cases will be launched against Member States if the Regulation is not correctly applied. 	
ERP/2014/rec4	<p>It is recommended to consider re-launching awareness campaigns about obligations for creditors to accept foreign IBANs</p>	<p>PSPs, national central banks, umbrella organisations of corporate and public authority payees, consumer organisations and competent authorities at national level</p>	<p>Based on a letter on this subject by the ERPB Chair, nearly all euro area national central banks (NCBs) have closely followed up on the issue of IBAN discrimination and acceptance of non-domestic IBANs. NCBs have taken the issue to national SEPA / retail payments fora and in most countries sent letters to relevant stakeholder groups increasing awareness by emphasizing the importance of both the spirit and the letter of relevant legal requirements. Based on NCBs feedback by the end of May to the ERPB Secretariat the elimination of IBAN discrimination in practice is on track in most or even has been fully achieved in some countries already (see summary of NCB replies in Annex 1).</p> <p>Similarly the EACT and the representatives of Public Administrations have followed up by sending letters to their constituencies highlighting the legal requirements related to IBAN-discrimination and the importance of complying with these regulations.</p>	Green
ERP/2014/rec5	<p>It is recommended that existing BIC-from-IBAN solution providers present the full reliability of their respective solutions to meet the market needs for BIC-from-IBAN derivation by 1 June 2015 at the latest to support the IBAN-only implementation by February 2016.</p>	<p>BIC-from-IBAN solution providers</p>	<p>The ECB has been in contact with the leading BIC-from-IBAN solution providers and they confirmed the readiness of their service.</p>	Green
ERP/2014/rec6	<p>It is recommended to continue providing information on local issuing authorities and to keep this information up to date via their websites</p>	<p>European System of Central Banks</p>	<p>The ECB, based on information from ESCB central banks, has updated and will continue to update where necessary its overview table of SEPA national issuing authorities (published on the ECB website).</p>	Green
ERP/2014/rec7	<p>It is recommended to standardise the provision of relevant data for BIC-from-IBAN derivation services as soon as possible (with a recommended date of 1 April 2015 at the latest) and to ensure a non-discriminatory and transparent access for all market participants (PSPs and PSUs)</p>	<p>Issuing authorities for bank identifiers in SEPA</p>	<p>Several issuing authorities have made substantial efforts to improve and standardise their provision of data on valid bank identifiers. NCB issuing authorities have agreed to follow up and improve the presentation of national bank identifiers where necessary to meet basic standards / requirements. According to latest information available to the ECB there are by now only very few issuing authorities which do not meet basic standards of data provision in this field.</p>	Green
ERP/2014/rec8	<p>It is recommended to investigate possible alternatives to meet the extended structured and unstructured remittance information demands from corporate PSUs</p>	<p>EPC and the EPC's Scheme End User</p>	<p>The starting point is to obtain first the feedback from the SEUF in particular. The end-user representatives need to indicate their concrete expectations.</p> <p>The EPC will ask for a position from the SEUF in the 3rd quarter</p>	Green

		Forum	of 2015.	
ERP/2014/rec9	It is recommended to monitor the evolution of the correct use of SDD R-transaction reason codes until December 2015 and act accordingly if needed	EPC	Talks are ongoing with the individual SEPA scheme compliant Clearing and Settlement Mechanisms (CSMs) to obtain four times per year, statistical information on national and/or cross-border r-transactions at country level relating to the current EPC SEPA schemes for the latest available period of three months. The EPC will analyse these statistics to identify any potential action.	Green
ERP/2014/rec10	It is recommended to report complaints about SDD scheme participants not using the appropriate reason code to the complaints body of the EPC.	SDD scheme participants	This option is available to any scheme participant in case of a breach of the Rulebooks by another scheme participant but to date no such formal complaint has been filed. The EPC made considerable efforts in the past to increase awareness on the proper usage of reason codes among scheme participants.	Blue
ERP/2014/rec11	It is recommended to investigate if and how national legal restrictions affecting the use of the appropriate SDD R-transaction reason codes could be removed	European Commission and Member States	R-transactions were addressed in the meetings of the EU SEPA Forum and CEGBPI, where Member States informed the Commission that the restrictions on communication of information regarding payers' accounts and the use of a "miscellaneous" code are linked to national laws on data protection. DG FISMA also raised the issue with the colleagues in DG JUST who are responsible for the proposals for a General Data Protection Regulation and the Data Protection Directive for Police and Criminal Justice Authorities. This Directive and Regulation are currently being negotiated by the European Parliament and Council. The Commission will inform the ERP Secretariat when the negotiations make progress on this issue.	Yellow
ERP/2014/rec12	It is recommended to include in the document EPC262-08 (CI overview): (a) clarifications about the possible use of a single CI across SEPA; and (b) contact details of the department at the national institution in charge of CI issuance in those countries where CIs are issued by a single authority	EPC	EPC review of the updated version of the document EPC262-08 (version 4.0) was completed. The publication of the updated version of the document EPC262-08 on the EPC Website has been done in the course of June 2015 (consult link CI overview).	Blue
ERP/2014/rec13	It is recommended to look for more appropriate attributes in a long term perspective (e.g., Legal Entity Identifier (LEI) as a unique entity identifier) to identify a creditor	EPC (supported by the European Central Bank and standardisation	An EPC report will be submitted about the potential added value of the LEI in the current three EPC SEPA schemes. The EPC will ask for a position from the SEUF and the ESTF in the 3rd quarter of 2015.	Green

		authorities)		
ERP/2014/rec14	It is recommended to assess whether the non-compliance with the SDD rulebook stipulations on SDD time cycles for SDD collections and SDD R-transactions is a problem linked to the SEPA migration	EPC	<i>See implementation status under ERP/2014/rec9</i>	Green
ERP/2014/rec15	It is recommended to consider, along with clearing and settlement mechanisms (CSMs), the implementation of validation checks to see if SDD R-transactions fall within the prescribed R- transaction calendar day timelines and if SDD R-transactions contain altered date elements compared with the date elements in the initial SDD collection	SDD scheme participants	Based on feedback from SDD scheme participants this seems to have been an issue more related to the migration process. As of late there have been no complaints to the EPC on scheme members not complying with R-transaction message timelines.	Green
ERP/2014/rec16	It is recommended to report persistent non-compliant behaviour by other SDD scheme participants to the complaints body of the EPC.	SDD scheme participants	<i>See implementation status under ERP/2014/rec10</i>	Blue
ERP/2014/rec17	It is recommended to ask those SDD Core scheme participants that are not SDD B2B scheme participants to reconsider adhering to the SDD B2B scheme in the case that they offer services to businesses.	EPC	An EPC letter (Letter EPC158-15) to promote the SDD B2B scheme has been sent to those SDD Core scheme participants that do not offer yet SDD B2B scheme services to their business customers.	Blue
ERP/2014/rec18	It is recommended that further familiarisation take place on the presented SDD collection remittance information.	PSPs, consumers and creditors	Based on inquiries made by BEUC and AGE Platform national consumer associations have not reported consumer complaints with regard to the way SDD remittance information is presented to consumers. Similarly the EACT did not identify major issues in this domain among creditors.	Blue
ERP/2014/rec19	It is recommended to continue monitoring if there is still a lack of clarity in the remittance information transmitted to consumers and if other actions are needed to achieve greater familiarity among all debtor groups, including those with low financial literacy.	ERP consumer representatives	<i>See status reported under ERP/2014/rec18. BEUC and AGE Platform will detect and communicate if any related issues emerge in the future.</i>	Blue
ERP/2014/rec20	It is recommended to prepare a clarification paper in the first half of 2015 listing the consequences of all possible mandate amendment scenarios initiated by a debtor or by a (collecting or ultimate) creditor for the validity of the signed SDD mandate and make recommendations if needed.	EPC and the EPC's Scheme End-User Forum	The EPC is not in a position to provide a clarification paper for the ERP recommendation 2014/20. Section 3.3 of the SDD rulebooks stipulates that the mandate must be governed by the law of a SEPA country. This means that the SDD mandate cannot be governed by the SDD rulebooks. Only one single entity or person can hold the formal creditor identity vis-à-vis the debtor. Any scenarios outside and beyond the four-corner model, e.g., in the context of any shared service centre infrastructures or	Yellow

			<p>so-called collection factories, is not for the EPC to outline or to describe.</p> <p>Questions of mandate amendment scenarios or about the validity of mandates are outside the scope of the SDD Schemes. These questions are (inevitably) subject to national law and beyond the reach of the EPC and its SEPA schemes. The EPC and the ECB will further discuss about this item.</p>	
ERPB recommendations on pan-European electronic mandates made in December 2014				
ERPB/2014/rec21	<p>It is recommended to publish a country specific inventory of identified national and pan-European legally binding signature methods applicable for e-mandate solutions, which might be accepted as proof (by the debtor PSP) in case of an after-eight-week refund claim regarding an unauthorised direct debit transaction as well as details by debtor PSP country of the applicable law when assessing the validity of the signature and mandate in case of a non-domestic e-mandate solution.</p>	EPC	<p>The EPC is not in the position to elaborate further in a meaningful way on this subject based on the evidence collected and given the lack of homogeneity across SEPA.</p> <p>In the first quarter of 2015, the ECB together with the national central banks in SEPA had conducted a research on the European legal framework and national legal regimes related to signing (issuing and authorising) of electronic mandates. This ECB research document outlined four important questions for follow-up by the EPC. The EPC had conducted a survey among the PSP communities based on these four questions. Based on the input collected out of this survey (document SEM 006-15), the EPC concludes that in the context of different national legislations, there are different legally binding signature methods leading to different practices in concluding electronic mandates or evaluating their validity in the event of a dispute. The way a mandate for SDD is validly concluded to allow the settlement for the provision of goods and services via SDD is primarily a matter between the debtor and the creditor, based on the contractual provisions with their PSPs and subject to applicable national law.</p> <p>If the creditor would allow for the use of a less secure signature method than a qualified electronic signature, it would be at its own risk, since the legal validity and the power of evidence of such signature methods across Member States remains at present uncertain. The debtor bank will make its determination based on its own rules and applicable legislation.</p> <p>The Regulation 'No 910/2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC' (the eIDAS Regulation) could provide a solution for the issue of signature of e-mandates.</p> <p>The EPC and the ECB will further discuss about this item.</p>	Yellow
ERPB/2014/rec22	<p>It is recommended that the handling of electronic mandates be opened up to foreign IBANs. This can be done either by updating the used solution or providing an alternative way of</p>	Creditors via their representat	<p>The EACT has sent letters to their constituency highlighting this recommendation to creditors.</p>	Green

	giving the mandate, with clear usage guidance from the creditors to the debtors on how such solutions can be used for cross-border SDDs.	ives in the ERPB		
ERPB/2014/rec23	It is recommended that debtor PSPs make use of the inventory (see Rec. 21) of different legally valid electronic signature methods for assessing the debtor authentication and authorisation of the electronic mandate in the case of an after-eight-week refund claim, within the constraints of applicable law.	PSPs via their representatives in the ERPB	<i>The implementation of this recommendation is dependent on the implementation status of ERPB/2014/rec21</i>	Yellow
ERPB/2014/rec24	It is recommended to develop and make publicly available (alongside the SDD rulebooks) a clarification paper explaining to the creditor the possible risks (liabilities) of not being able to prove to the debtor PSP that a legally binding electronic signature method was used.	EPC	On 4 May 2015, the EPC published the document EPC033-15 'Clarification Paper on the Use of Electronic Mandate Solutions' on the EPC Website (please consult link Item for ERPB/2014/rec24)	Blue
ERPB/2014/rec25	It is recommended – after putting in place the implementation acts as foreseen in the Regulation (EU) No 910/2014 – to continue to monitor the cross-border usage of qualified electronic signatures and, if needed, take further steps to ensure cross-border usability for PSPs and PSUs.	European Commission	DG FISMA organised a productive meeting between the SEPA rulebook owner (EPC) and DG CNECT e-IDAS team to present Regulation 910/2014 and its consequences on the adoption of qualified e-signatures. This Regulation will ensure interoperability, based on mutual recognition of solutions, which will boost the use of qualified e-signatures on a cross-border level.	Green
ERPB/2014/rec26	It is recommended that electronic mandate service providers using technically similar models be open to interoperability and if feasible make use of the technical description provided in Annex VII of the SEPA direct debit scheme rulebooks.	Electronic mandate solution providers	No concrete steps have been taken, it is difficult to reach electronic mandate solution providers any more directly than publishing the ERPB statement	Red
ERPB/2014/rec27	Creditors (and if relevant PSPs) should carefully consider whether the e-mandate solution they choose to employ enables the Debtors to make and manage the changes and cancellations of the recurrent mandates or not.	Creditors via their representatives in the ERPB	The EACT has highlighted to their constituency the importance of having appropriate e-mandate management processes in place.	Green

**Annex 1: Summary of follow-up made by national central banks of the Eurosystem on
IBAN-discrimination**

Country / NCB	IBAN discrimination
<p>BE</p> <p>Banque Nationale de Belgique / Nationale Bank van België</p>	<p>In Belgium the competent authority has been made aware of only a very few cases of IBAN discrimination. These issues were directly settled by contacting the beneficiary's bank.</p> <p>The Belgian Banking Association, in close cooperation with the central bank, decided to redesign its website dedicated to SEPA focusing on rules related to the SEPA payment instruments and on post migration issues.</p>
<p>DE</p> <p>Deutsche Bundesbank</p>	<p>This issue has been addressed via relevant national committees dealing with retail payments, incl. the national SEPA forum (and the constituencies of the members). In general relevant stakeholders have acknowledged the obligation to accept domestic as well as non-domestic IBANs when making or receiving payments in euro.</p> <p>Bundesbank also receives and reacts to IBAN discrimination complaints, in doing so they also pro-actively follow up with associated creditors.</p> <p>Bundesbank has used every possibility to convey the message, e.g. speeches, presentations, newsletter articles.</p>
<p>EE</p> <p>Eesti Pank</p>	<p>There have been no reported issues related to IBAN discrimination. This topic will be also on the agenda of the forthcoming Estonian Payments Forum (which includes also as a member the Estonian Consumer Protection Board). The Estonian banking community is well aware of the conclusions and recommendations of the December ERPB meeting.</p>
<p>IE</p> <p>Central Bank of Ireland</p>	<p>The Central Bank of Ireland, together with the Irish banking industry, engaged in a significant public information/ awareness campaign during the course of the migration of Irish retail electronic retail payments to SEPA in 2014. This campaign covered, inter alia, the requirement that creditors must accept non-Irish IBAN's from debtors in the context of SEPA Direct Debit (SDD) payments.</p> <p>The Central Bank of Ireland, as the designated authority, have not been made aware of any incidents of IBAN discrimination. Accordingly the Central Bank of Ireland and the Department of Finance, in light of the lack of complaints, have no plans to take any specific action in this regard.</p>
<p>ES</p> <p>Banco de España</p>	<p>Related messages were distributed via the National Payments Committee (and its members' constituencies). BdE is also actively informing the Treasury, Ministry of Finance and Public Administration.</p> <p>It is planned to include a message on Art 9 of the SEPA end-date regulation, into their communication plan regards to the migration of niche products and the finalisation of exemptions (by 1 Feb 2016).</p>
<p>FR</p> <p>Banque de France</p>	<p>This issue has been addressed via the French National SEPA Committee and its members. All cases of IBAN discriminations have been flagged also to relevant stakeholders' professional associations.</p> <p>Cooperation with other national competent authorities (Directorate General for competition policy, consumer affairs, and fraud control; and the French Treasury) to raise awareness and take all necessary measures.</p> <p>To further raise awareness of French companies of the obligations set in Art 9, this topic will be on the agenda of the French Association for Corporate Treasures.</p>
<p>IT</p>	<p>The IBAN discrimination issue has been tackled within the newly-established Italian Payments Committee (IPC), chaired by the</p>

<p>Banca d'Italia</p>	<p>Banca d'Italia, whose members are representatives of the supply and demand side among which are Confindustria (the Italian association of manufacturing and service companies) and AITI (the Italian association of corporate treasurers). A related statement will also be published on the central bank's website.</p> <p>Furthermore, the Banca d'Italia has contacted the major Italian utilities companies in order to raise their awareness of the relevance of the issue and take stock of the solutions in place or about to be implemented. Banca d'Italia as competent authority for Art 9 also rigorously follows up on all complaints related to IBAN-discrimination.</p>
<p>LV</p> <p>Latvijas Banka</p>	<p>IBAN discrimination is not an issue in Latvia. Therefore there is no need to re-launch an awareness campaign on the use of IBAN among the stakeholders in Latvia.</p>
<p>LT</p> <p>Lietuvos Bankas</p>	<p>The provisions of Art 9 of SEPA end-date regulation have been explicitly included and further explained in the on-going SEPA awareness campaign. [LT has to be fully migrated by 1 Feb 2016]</p> <p>In addition Lietuvos Bankas in cooperation with the Ministry of Finance has initiated the review of existing legal acts conflicting with Art 9.</p> <p>Lietuvos Bankas has also initiated the review of its mandate in order to be authorised to impose penalties on non-financial institutions, if found in infringement with Art 9 (this change has yet to be supported by the Parliament's vote).</p>
<p>LU</p> <p>Banque Centrale de Luxembourg</p>	<p>BCL has issued a press release stressing the prohibition of IBAN-discrimination. The press release was also forwarded to the banking association and local creditors using direct debits.</p>
<p>MT</p> <p>Central Bank of Malta</p>	<p>There have been no reported cases of IBAN discrimination. Until now active communication has perceived to be not necessary.</p>
<p>NL</p> <p>De Nederlandsche Bank</p>	<p>All ERPB conclusions and recommendations were conveyed via the National Forum on the Payment Systems and other relevant bodies.</p> <p>The National Forum on the Payment Systems established a contact-centre on IBAN discrimination (until now 117 reported cases which are mainly concentrated on issues with SDDs). Half of the complaints have been solved, including with help of other national central banks and competent authorities.</p>
<p>AT</p> <p>Oesterreichische Nationalbank</p>	<p>The AT competent authority – the Austrian Financial Market Authority (FMA) – has received several complaints. These cases are investigated individually. Vice versa (via Austrian PSPs) there have been cases where AT IBANs are not accepted by foreign (non-domestic) creditors.</p> <p>An active approach has been taken by FMA and OeNB – reminders have been sent to all relevant stakeholders; and the federal chamber of commerce published recently a press release to remind creditors that they must comply with Art 9 of the SEPA end-date regulation.</p>
<p>PT</p> <p>Banco de Portugal</p>	<p>Banco de Portugal has addressed the issue of IBAN-discrimination actively and explicitly at various meetings dedicated to SEPA migration activities. To raise awareness, efforts have been made in liaison with several stakeholders at national level, in particular with the Public Administration bodies represented in the Portuguese SEPA Steering Committee.</p> <p>[Portuguese Social Security is amending their systems to accept also non-domestic IBANs; the Tax Authority has announced that technological and legal restrictions will be removed by 2016.]</p>

<p>SI</p> <p>Banka Slovenije</p>	<p>Banka Slovenije (the competent authority for Art 9 of the SEPA Regulation) has received no formal complaints or reports of breaches of the relevant provision to this date. Nevertheless, Banka Slovenije has followed the ERPB recommendation aiming at raising awareness among the relevant stakeholders - by using the platform of the Slovenian National Payments Council. A letter was sent by the central bank to members of the National Payments Council highlighting the relevant legal requirement and asking them to raise awareness within their respective stakeholder groups.</p>
<p>SK</p> <p>Národná Banka Slovenska</p>	<p>Messages related to Art 9 were included in the SEPA migration communication campaign during 2013-2014 (via SEPA forum and the directly by the central bank). If needed NBS is ready to support.</p>
<p>FI</p> <p>Suomen Pankki</p>	<p>All ERPB conclusions and recommendations were conveyed via the Finnish Payments Council.</p> <p>Based on discussions with the Financial Supervisory Authority and the Finnish Federation of Financial Services, IBAN discrimination is not a problem in Finland.</p>