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EFIP 12 February 2024 - IBAN Discrimination

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Agenda

- Extent of IBAN Discrimination in Ireland
- Identified root causes
- Summary of key actions/experiences to date
- Conclusion



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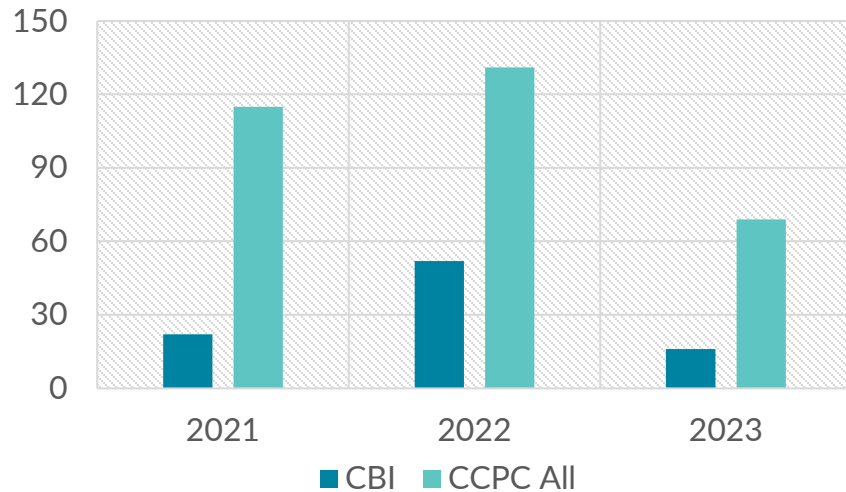
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Extent of IBAN Discrimination in Ireland

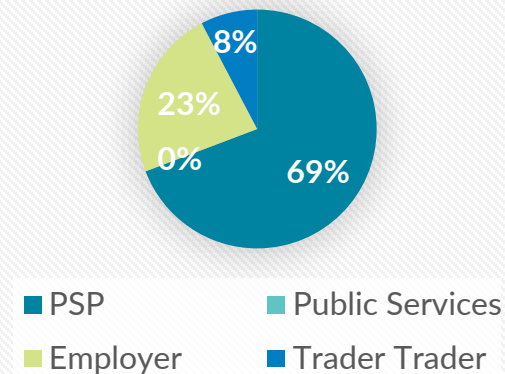
NCA's

The Competition and Consumer Protection Commission (CCPC) is the competent authority in Ireland for cases involving a consumer and a trader.
For all other cases, the Central Bank of Ireland (CBI) is the competent authority.

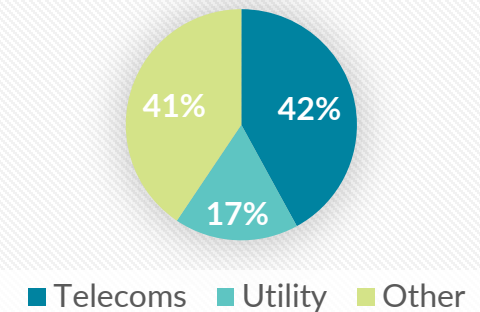
Overview of reported cases



CBI - 2023 cases



CCPC - 2023 complaints



- Not all cases of IBAN discrimination are reported to the CBI/CCPC** so these figures likely understate the size of the issue in IE.
- Figures reported by the CBI reflect outright IBAN Discrimination, figures reported by the CCPC reflect all complaints received.

*[Annex 1](#) provides a further breakdown on CCPC complaints received.

** Some cases are reported via [AcceptMyIBAN.org](https://www.acceptmyiban.org) (AMI), which is an initiative set up by private sector fintechns, whereby members of the public can report instances of IBAN discrimination in any jurisdiction. Similarly, a large proportion of complaints reported via AMI are not deemed to be outright IBAN Discrimination.



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Primary Root Causes

Outdated
systems

Outdated
documentation

Lack of
awareness in
customer facing
teams

Lack of
awareness
of the
SEPA Regulation

Confusion between IBAN
Discrimination and 'frictions'



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Primary actions taken to combat IBAN Discrimination

- In Ireland, both NCAs actively investigate and respond directly to all complainants. Where necessary, the NCAs engage directly with the offender to ensure compliance. Most cases are resolved with the use of moral suasion.

Legislative Amendment

- [S.I. No. 253/2023](#) introduced to broaden the scope of the CBI's powers in respect of IBAN Discrimination

Communications Campaigns

- CBI & CCPC initiated an extensive range of communications campaigns to educate/reinforce obligations under SEPA, and to generate further public awareness

Co-operation amongst NCAs

- Working together to more effectively achieve common goals



Primary actions taken to combat IBAN Discrimination (cont'd)

Engagement with the European Commission/NCBs

- ❑ New approaches adopted and strengthened to influence more favourable treatment of non-IE IBANs after seeking clarity on 'second order' IBAN Discrimination

Supporting other IBAN Discrimination initiatives

- ❑ New project underway in SMET* in respect of IBAN Discrimination
- ❑ Both the CBI and CCPC continue to actively engage to assist in mapping the existence of IBAN Discrimination practices in Ireland

Accept My IBAN (AMI) data

- ❑ Data requested periodically for analysis (main focus on leading/repeat offenders)
- ❑ Positive results influencing entities to deploy appropriate enhancements

*The Single Market Enforcement Taskforce (SMET) is responsible for identifying and removing concrete barriers in the Single Market.



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Primary actions taken to combat IBAN Discrimination (cont'd)

Some experiences of targeted engagement with leading offenders

IE Retail Bank 1 (IBAN Discrimination)

- ❑ RMP* instruction issued requiring both technical and policy changes
- ❑ Regular engagement meetings, analysis of progress reports
- ❑ Requirements successfully implemented in 2023, to include training/awareness within customer facing teams

No further complaints received in H2. 2024 data expected to highlight further effectiveness

Public Body (IBAN Discrimination)

- ❑ Road map presented highlighting planned resolution of technical issues
- ❑ Regular engagement meetings, and analysis of progress reports.
- ❑ Technical issues resolved in 2022

No public body complaints received in 2023

Multinational Entity (accepting non-IE IBANs albeit under less favourable conditions)

- ❑ Frictions identified from both a policy and technical perspective
- ❑ Regular engagement, analysis of progress reports
- ❑ Enhancement implemented Q3 2023

No direct complaints received in Q4 2023. 2024 data expected to highlight further effectiveness

IE Retail Bank 2 (accepting non-IE IBANs albeit under less favourable conditions)

- ❑ Commitment secured to enhance offerings:
 - Q1 2024: Mobile App to enable SEPA payments to non-IE IBANs
 - Q2 2024: Mobile App/Internet Banking to enable functionality to add non-IE IBANs as beneficiaries
- ❑ Ongoing engagement on related progress

Effectiveness will be measured following implementation in 2024



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* Risk Management Plan (RMP)

Conclusion

The EFIP members are invited to:

1. take note of the update on IBAN discrimination in Ireland; and
2. share views on further steps / best practices that could be taken in Ireland to further prevent IBAN discrimination.



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Annex 1 - CCPC complaints

CCPC Contacts	2021	2022	2023	Grand Total
TELECOMMUNICATIONS	56	43	29	128
FUEL & UTILITIES	19	30	12	61
GENERAL/NON-SECTOR-SPECIFIC QUERIES	10	40	5	55
OTHER GOODS & SERVICES	14	3	6	23
RECREATION/SPORT/LEISURE	6	2	3	11
TRAVEL, TRANSPORT & HOLIDAYS		2	6	8
SPECIALIST & PROFESSIONAL SERVICES	2	5		7
CATERING/ ACCOMMODATION	2	2	2	6
ON-LINE SERVICES (RECREATIONAL)	2	1		3
FINANCIAL SERVICES (COMPETITION ONLY)	1		1	2
HOUSE BUILDINGS/MAINTENANCE/IMPROVEMENTS			2	2
DOMESTIC APPLIANCES		2		2
VEHICLES & PERSONAL TRANSPORT	1		1	2
COSMETICS & BEAUTY			1	1
FURNITURE & FURNISHINGS			1	1
HEALTHCARE	1			1
AV/ELECTRONIC AND ASSOC. GOODS		1		1
GROCERIES & HOUSEHOLD	1			1



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