EFIP – Workstream on IBAN Discrimination

Activity Report

26 June 2025

Introduction

- In February 2024, EFIP established a workstream on IBAN discrimination. The members are all euro area Member States and on a voluntary basis non-euro area Member States.

- The objective of the workstream is **to share regularly information on the state, actions and progress on IBAN discrimination**.

- The workstream held the **kick-off meeting in November 2024**.

- As a follow-up, the EFIP Secretariat distributed two questionnaires and collected data and information:
  - ➤ for the periods 01/01/2024 – 30/06/2024 and 01/07/2024 – 31/12/2024.

- The Secretariat has also requested data for the same periods from the "AcceptMyIBAN" coalition.

- The collected data was presented and discussed at a workstream meeting at the beginning of June.

- **These data exercises, periodically repeated, will help to identify developments, best practices and to improve/implement actions against IBAN discrimination.**

Findings - Complaint development overview

Positive trend – Member States data

- In 2024, Member States* registered a total of 385 complaints.

- A comparison of the first half-year, during which Member States registered 217 complaints, with the second half-year, during which MS registered 168 complaints, reveals a decrease of 49 cases (-23%).

- The number of complaints relating to public administrations decreased from 29 in the first half of the year to 16 in the second.

- For the second half of 2024, Member States** reported that, following at least a preliminary assessment, 47 of the 168 complaints were confirmed as IBAN discrimination.

All eurozone MS plus Romania.
*** Based on data from 20/21 Member States.*

H1 2024	H2 2024
217 29	168 16
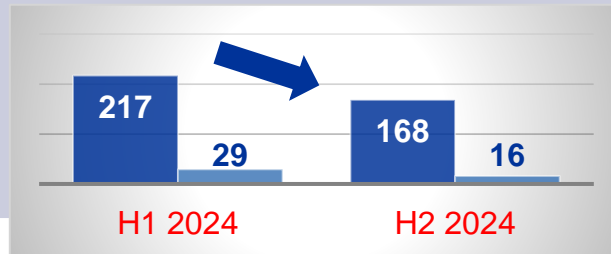
Findings - Root causes

What are the root causes of IBAN discrimination related to the complaints received?

- **Outdated IT systems***.* For instance: *"There are instances where business processes and software applications have yet to be adapted to SEPA requirements/standards".*

- **Lack of knowledge.** For instance: *"employees in the company are not properly trained about the prohibition of IBAN discrimination".*

- **Risk-based decisions.** For instance: "*Risks of money laundering and terrorist financing (ML/TF) or fight against fraud"* or *"Additional information from the financial institution is requested (for the KYC process)".*

- **National rules.** "*Some public services have developed their own rules which include the requirement that payments can only be made into a national account*".

Findings - Measures

What are the measures taken by the National Competent Authorities to address IBAN discrimination?

As a first step, most authorities use supervisory powers, awareness campaigns, moral suasion, and warnings. For instance:
- *"The first phase is to provide information, raise awareness and does not involve repressive action";*
- *"to issue a warning, i.e. a request to stop the violation out of court within around three weeks".*

Then they proceed with legal acts and sanctions. For instance:
- *"If an agreement cannot be reached, we use the instrument of a civil injunction";*
- *"The organisation is granted two weeks to comply. If IBAN discrimination persists, a fine is imposed".*

In a few Member State responses, the approach is proactive. For instance:
- *"a repressive investigation targeted banks, insurances, utilities suppliers";*
- *"Accept My IBAN data is requested periodically by the Central Bank, and action is taken if necessary (main focus on leading/repeat offenders)."*

Conclusions and next steps

- **All data collected over the last year indicates a downward trend in complaints about IBAN discrimination. Future data collection exercises will ascertain whether this positive trend will continue.**

- **In Member States where ambitious measures have been taken, there appears to be a correlation with a decline in the number of IBAN discrimination cases.**

- **Taking strong measures and being proactive against IBAN discrimination works well!**

- **Work continues: the next questionnaire and the collection request for AcceptMyIBAN platform data will relate to H1 2025 and will be dispatched in August.**

- **The results will be compared with the information for 2024 to identify positive and negative developments.**

ANNEX

Section 1 - complaints overview

| • Complaints received by the National Competent Authorities
• Unscreened reports to the AcceptMyIBAN website | } between 1 January 2024 and 31 December 2024 |

MS	MS - Questionnaires		MS - confirmed cases	AcceptMyIBAN		Development MS complaints	Development AcceptMyIBAN complaints
	H1 2024	H2 2024	H2 2024	H1 2024	H2 2024		
AT	12	9	2	35	21	- 3	- 14
BE	-	4	2	9	3	+ 4	- 6
CY	-	1	1	-	2	+ 1	+ 2
DE	48	31	9	94	80	- 17	- 14
EE	1	1	0	-	2	=	+ 2
ES	3*	3*	3	49	37	=	- 12
FI	1	-	-	3	2	- 1	- 1
FR	16	9	N/A	43	49	- 7	+ 6
GR	2	-	-	2	2	- 2	=
HR	9	5	1	5	2	- 4	- 3

* The questionnaire H1 was answered by 10 of the 19 regional Consumer Authorities and H2 by 17 of the 19 regional Consumer Authorities.

> 10 complaints

Section 1 - complaints overview

- **Complaints received by the National Competent Authorities**
- **Unscreened reports to the AcceptMyIBAN website**

between 1 January 2024 and 31 December 2024

MS	MS - Questionnaires		MS - confirmed cases	AcceptMyIBAN		Development MS complaints	Development AcceptMyIBAN complaints
	H1 2024	H2 2024	H2 2024	H1 2024	H2 2024		
IE	31	30	5	17	6	- 1	- 9
IT	18	20	5	55	69	+ 2	+ 14
LT	1	-	-	2	-	- 1	- 2
LU	-	1	1	3	-	+ 1	- 3
LV	-	-	-	-	-	-	-
MT	-	-	-	1	2	-	+ 1
NL	67	38	12	17	21	- 29	+ 4
PT	7	9	4	19	2	+ 2	- 17
RO	-	1	-	-	-	+ 1	-
SI	1	6	2	1	-	+ 5	- 1
SK	-	-	-	1	1	-	=

> 10 complaints

Section 1 - complaints related to public administrations

- **Complaints related to IBAN discrimination by public authorities**
- **Reported to the AcceptMyIBAN website** } **between 1 January and 31 December 2024**

MS	MS - Questionnaires			AcceptMyIBAN			Development MS complaints	Development AcceptMyIBAN complaints
	H1 2024	H2 2024	Public authority	H1 2024	H2 2024	Public authority		
AT	4	1	-	5	3	TV, pensions	- 3	- 2
BE	-	1	Regional government	3	-	Public agency, pension	+ 1	- 3
CY	-	-	-	-	1		=	+ 1
DE	2	1	Political party, social insurance	21	14	Public transport, tax, city, universities	- 1	- 7
EE	-	-	-	-	-		=	=
ES	N/A	N/A	-	4	4	Social security, tax	N/A	=
FI	1	-	-	1	-	Army	- 1	- 1
FR	N/A	N/A	-	11	9	City, health	N/A	- 2
GR	2	-	-	1	1	Health	- 2	=
HR	8	5	Pension and social security, state-owned utility services	2	-	TV, social security	- 3	- 2

Section 1 - complaints related to public administrations

- **Complaints related to IBAN discrimination by public authorities**
- **Reported to the AcceptMyIBAN website**

} **between 1 January and 31 December 2024**

MS	MS - Questionnaires			AcceptMyIBAN			Development MS complaints	Development AcceptMyIBAN complaints
	H1 2024	H2 2024	Public authority	H1 2024	H2 2024	Public authority		
IE	4	1	Water service, motor tax	-	-	-	- 3	-
IT	2	5	Pensions and social services, tax authorities	4	13	Pension and social security, tax authorities	+ 3	+ 9
LT	-	-	-	1	-	Universities	-	- 1
LU	-	-	-	-	-	-	-	-
LV	-	-	-	-	-	-	-	-
MT	-	-	-	-	-	-	-	-
NL	5	2	Municipality, chamber of commerce	-	2	Tax authorities	- 3	+ 2
PT	1	-	-	1	-		- 1	- 1
RO	-	-	-	-	-	-	-	-
SI	-	-	-	-	-	-	-	-
SK	-	-	-	-	-	-	-	-

Section 1 - Complaint development overview - AcceptMyIBAN

Positive trend – AcceptMyIBAN platform data

- In 2024, the AcceptMyIBAN* platform recorded a total of 657 complaints.

- A comparison of the first half-year, during which the AcceptMyIBAN platform recorded 356 complaints, with the second half-year, during which the platform recorded 301 complaints, reveals a decrease of 55 cases (-15%).

- The number of complaints relating to public administrations decreased from 54 in the first half of the year to 47 in the second.

For all eurozone MS plus Romania.

356   54   301   47

H1 2024   H2 2024
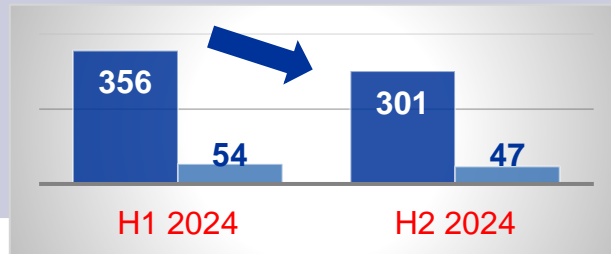
Section 2 - effectiveness of measures

To what extent were these measures effective or not? Why?

Using awareness campaigns, moral suasion and warnings. For instance:
- *"Bilateral engagements has proved effective in ensuring voluntary compliance";*
- *"informal contacts have brought/are likely to bring solutions to the cases";*
- *"The mere mention of the possible enforcement often leads to adequate measures";*
- *"The communication actions to raise awareness of IBAN discrimination was very helpful".*

Adopting legal actions and sanctions. For instance:
- *"The administrative proceedings imposed a total of eight pecuniary fines";*
- *"In an average of five cases per year, the authority files a lawsuit with the responsible regional or higher regional court".*

Proactive investigations are effective. For instance:
- *"These controls accelerated the implementation of Article 9 by operators and sanctioned those who did not comply with the text."*

Section 2 - plans for additional measures

Please outline the additional measures that the National Competent Authorities plan to implement in order to eliminate IBAN discrimination.

Most of the Member States are not planning to take additional measures, beyond the actions following the complaints and some general communication efforts.

Few exceptions:

- *"Investigation with repressive purposes for public and private operators continues next year"; and*

- *"Consumption Authorities are planning to control online forms annually to prevent the persistence of IBAN discrimination".*

Section 2 - other bodies active in IBAN discrimination

Have any other public or private bodies (committees, associations, etc) taken specific measures to address IBAN discrimination?

The vast majority of responding Member States answered negatively.

Exceptions:
- Several Member States have indicated that the national payments committees are also taking action to address IBAN discrimination.
- The involvement of Member States in the Single Market Enforcement Task Force project, where the EU Commission and Member States worked together to address IBAN discrimination, was also mentioned.

Suggestions:
- *"Compliance could be improved if sectoral regulators (e.g. utilities, telecoms) were to play a greater role in ensuring that SEPA requirements/standards are duly implemented in those sectors"*.
- *"To include the topic in the National Retail Payments Strategy"*.

Section 2 - application of suggested best practices

These best practices were mentioned in the statement of the last EFIP meeting held in February 2024:
- Amending national laws where necessary;
- Moving from a "waiting for complaints" approach to an active one, e.g., conduct targeted investigations in areas where IBAN discrimination occurs;
- Enhancing communication efforts to raise awareness of IBAN discrimination, insist on the need to end it, and communicate access points for IBAN discrimination complaints;
- Imposing effective and dissuasive fines on offenders to provide clear incentives to make the necessary investments to achieve compliance as soon as possible.

Which, if any, of the best practices have been considered or implemented?

- **Many** responses: enhancing communication efforts to raise awareness (e.g. updating the information on the website with examples; communication campaign in 2025 focusing on specific cases, such as salary payments; conducting surveys); communicate/establish a dedicated access point for IBAN discrimination.

- **Several** responses: imposing effective and dissuasive fines.

- **A few** responses: amending national laws to avoid IBAN discrimination by public authorities.

- **A few** responses: conduct targeted investigations in areas where IBAN discrimination occurs.

Yearly timeline – General

From 2025 on, each semester the WS will analyse data from the previous semester.

1st Semester						2nd Semester					
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

WS Secretariat
Questionnaire dispatch for the previous semester

WS Members
Deadline for response submission

WS Secretariat
Deadline for analysing collected responses

Semi-annual meeting

WS Secretariat
Questionnaire dispatch for the previous semester

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Deadline for response submission

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