

# SEPA in Spain



#### **Useful links**

Spanish official SEPA website (in Spanish language) – http://www.sepaesp.es/ National Central Bank of Spain – www.bde.es/bde/en

Official Migration Guide for the Spanish market – Download the PDFs

English version – Spanish version

Official Migration Guide for SEPA Direct Debit – Download the PDFs

English version – Spanish version

#### **Quick facts**

- Number 7\* in SEPA Credit Transfer adoption rate with 40% in Q4 2012 (source: ECB)
- Number 4\* in Gross Domestic Product with 1032 billion euro in 2012 (source: IMF)
- Number 4\* in population with 46.2 million people in 2012 (source: Eurostat)

## **International Bank Account Number (IBAN)**

#### **IBAN** structure

Spanish IBAN a	Spanish IBAN accounts have 24 characters							
Country code 2 letters	Check digit 2 numbers	Spanish legacy bank code 4 numbers	Spanish legacy branch code 4 numbers	Check digit 2 numbers	Spanish national legacy account number 10 numbers			
Position 1 and 2	Position 3 and 4	Position 5 to 8	Position 9 to 12	Position 13 and 14	Position 15 to 24			

<sup>\*</sup> ranked among 17 euro member states



ES	12	1234	1234	12	1234567890
----	----	------	------	----	------------

#### **IBAN** conversion services

Local Spanish legacy account numbers can be converted to IBAN format using the IBAN BIC service, endorsed by the Spanish banks, available online at http://www.sepaesp.es/herramienta/conversion.htm

This service is available for both single accounts and for bulk IBAN conversions, but bulk conversion is a paid-for service and requires registration and a contract.

RBS offers you legacy Spanish account to IBAN conversion services and, if needed, automated enrichment of your payment files, as part of RBS SEPA Accelerator. To learn more about these services please contact your RBS representative.

## **Local payment formats**

Legacy file formats that can be used until 1 February 2014				
Norma 34	For Spanish domestic non-urgent euro transactions			
Norma 34.1	For Spanish domestic and cross-border non-urgent euro transactions within the SEPA zone			
Norma 34.01	For Spanish domestic non-urgent transactions with charges code (OUR, BEN, SHA)			
Norma 34.11	For Spanish domestic and cross-border non urgent euro transactions with charges code (OUR, BEN, SHA)			
Norma 19	Domestic Direct Debits, Business to Consumer			

By 1 February 2014 you are required to use ISO 20022 XML (CGI) files as a replacement for the abovementioned files

Legacy file formats that can be used until 1 February 2016				
Norma 34.14	For SEPA-compliant Credit Transfer			
Norma 19.14	For SEPA-compliant Direct Debit Core Scheme			
Norma 19.44	For SEPA-compliant Direct Debit Business to Business Scheme			

By 1 February 2016 at the latest you are required to use ISO 20022 XML (CGI) files as a replacement for the above-mentioned files. (Spain has applied the ISO 20022 XML derogation.)

Source: RBS



RBS offers you value-added solutions to file translation and enrichment, so that your legacy files are translated for you, as part of RBS SEPA Accelerator. To learn more about these services please contact your RBS representative.

# Payment instruments: convergence to SEPA

Legacy payment instruments	SEPA payment instrument
Domestic single and batch ACH payment (Norma 34, 34.01, 34.1, 34.11 and 34.14)	SEPA Credit Transfer (SCT)
International Standard Payment in SEPA zone and in euro (Norma 34.1, 34.11 and 34.14)	
Legacy collection instruments	SEPA collection instrument
Domestic Direct Debits (Norma 19 and 19.14)	SEPA Direct Debit (SDD) Core
Domestic Direct Debits (Norma 19 and 19.44)	SDD Business to Business
Legacy instruments	Which will be continued
Direct Debit Discounting (Norma 58)	Is a niche product and will remain unchanged until 1 February 2016
Commercial Discounting (Norma 32)	Is a niche product and will remain unchanged until 1 February 2016

Source: RBS

# **Derogations**

Derogation	Applicable date	Applicable	Significance for you
Translation from BBAN to IBAN	Start 01-02-2014 End 01-02-2016	Yes	As a business client you are required to provide ordering and beneficiary account numbers in IBAN format for all non-urgent euro transactions within the SEPA zone after 1 February 2014.  Consumers in Spain are not obliged to provide IBAN for national transactions, as banks in Spain are allowed to offer consumer clients conversion services to IBAN until 1 February 2016.



Derogation	Applicable date	Applicable	Significance for you
Niche products	Start 01-02-2014 End 01-02-2016	Yes	Legacy products Direct Debit Discounting (Norma 58) and Commercial Discounting (Norma 32) will not migrate to SEPA until 1 February 2016; SEPA requirements (IBAN and XML) do not apply to niche products.  You are required to use only SEPA payment instruments for all other non-urgent euro transactions within the SEPA zone after 1 February 2014.
ISO 20022 XML	Start 01-02-2014 End 01-02-2016	Yes	You are required to use only ISO 20022 XML messages for bulk non-urgent euro payment and collections files within the SEPA zone after 1 February 2016.
IBAN and BIC	Start 01-02-2014 End 01-02-2016	No	You are no longer required to provide BIC codes for national SEPA payments and collections after February 2014; IBAN will suffice for identification of your national. counterparty.

Source: European Central Bank and Spanish SEPA Migration Monitoring Committee

# **Comparison of legacy and SCTs**

Scheme	Legacy	SEPA Credit Transfer	SEPA Credit Transfer
File format	Norma 34, 34.01, 34.1 and 34.11	Norma 34.14	XML Pain.001.001.03
Supportive of SCT	No	Yes	Yes
Debtor and creditor account details	Legacy accounts and IBAN	IBAN accounts and BIC codes	IBAN accounts and BIC codes
Eligible beneficiaries	Consumer and business, global	Consumer and business, in 32 SEPA countries	Consumer and business, in 32 SEPA countries
Delivery timelines for debit on day D	D	D	D



Scheme	Legacy	SEPA Credit Transfer	SEPA Credit Transfer
RBS cut-off time at D*	For Domestic: Access Direct / SWIFTNet FileAct – 14h30 CET and 14h00 CET for files with more than 20k transactions Access Online / Local Electronic Banking / SWIFTNet FIN - 15h00 CET For International: Access Direct / SWIFTNet FileAct – 15h00 CET Access Online / Local Electronic Banking / SWIFTNet FIN - 15h30 CET	12h00 CET (14h00 CET from September 2013)	12h00 CET (14h00 CET from September 2013)
Book date / value date (when received prior to cut-off time)	Debit: D Credit: D+1	Debit: D Credit: D	Debit: D Credit: D
Clearing and settlement	National clearing	National clearing and/or EBA STEP2	EBA STEP2

<sup>\*</sup>Cut-off times are applicable for those formats/channels that support legacy scheme in the country.

#### Additional optional service

The Spanish banking community plans to adopt an optional shorter cycle for both SDD Schemes: D-1 also called COR1. This scheme allows for shorter (D-1) file submission timelines for first/one-off and recurrent collections compared to the regular Core scheme timelines, with D-5 and D-2 respectively. All other characteristics of this scheme are the same as for the regular SDD Core scheme. It is expected that roll-out will start in Q3 2013. RBS intends to support the SDD COR1 scheme.

# **SEPA Direct Debit (SDD) management**

#### **Creditor Identifier for SDD**

Spanish SDD Creditor Identifiers have 16 characters							
Country code 2 Letters	Check digit 2 numbers	Business code (set yourself)	Legal form indicator	National Creditor Identifier <sup>1</sup>	Check digit 1 number or a		
		3 letters	1 letter	7 numbers	letter		



Spanish SDD Creditor Identifiers have 16 characters							
Position 1 and 2	Position 3 and 4	Position 5 to 7, default ZZZ	Position 8	Position 9 to 15	Position 16		
ES 12 ZZZ A to W 12345671 1 or A to W							

Source: European Payments Council

Note: (1) in Spain, National Creditor Identifiers can be related to:

- 1. Legal entities, using their NIF ("Número de Identificación Fiscal")
- 2. Spanish Individuals, resident and non-resident, using their NIF or their DNI ("Documento Nacional de Identidad")
- 3. Foreign individuals, using their NIE ("Número de Identidad de Extranjero").

In Spain, SDD Creditor Identifier can be requested from RBS.

# **Comparison of legacy and SDD**

Scheme	CSB N19	SEPA Direct Debit Core	SEPA Direct Debit Business to Business	SEPA Direct Debit Core	SEPA Direct Debit Business to Business
File Format	Norma 19	Norma 19.14	Norma 19.44	XML Pain.008.001.02	XML Pain.008.001.02
Supportive of SDD	No	Yes	Yes	Yes	Yes
Debtor and creditor account details	Legacy accounts (Codigo Cuenta Cliente 'CCC')	IBAN accounts and BIC codes	IBAN accounts and BIC codes	IBAN accounts and BIC codes	IBAN accounts and BIC codes
Eligible debtors	Consumer and business, but only in Spain	Consumer and business, in 32 SEPA countries	Business only, in 32 SEPA countries	Consumer and business, in 32 SEPA countries	Business only, in 32 SEPA countries
Micro enterprises	Not applicable	Not applicable	Seen as business	Not applicable	Seen as business
Mandates	Debtor's bank and creditor hold a paper version	Creditor holds a paper version	Creditor holds a paper version	Creditor holds a paper version	Creditor and debtor bank hold a paper version

Scheme	CSB N19	SEPA Direct Debit Core	SEPA Direct Debit Business to Business	SEPA Direct Debit Core	SEPA Direct Debit Business to Business
Mandate migration	Yes, to Core	Yes, to Core	Never, always new mandate required	Yes, from legacy	Never, new mandate always required
Mandate check by bank	Not required	Not required	Obliged to check every transaction against the mandate, before debiting	Not required	Obliged to check every transaction against the mandate, before debiting
Frequency	Recurring and one-off	Recurring and one-off	Recurring and one-off	One-off and recurring	One-off and recurring
Delivery timelines for debit on day D	D-1	D-5 for first/ one-off D-2 for recurrent/last	D-1	D-5 for first/ one-off D-2 for recurrent/last	D-1
RBS cut-off time on delivery day*	12h00 CET	12h00 CET	12h00 CET	09h00 CET (from June 2013)	09h00 CET (from June 2013)
Pre-notification timelines	Not required	14 calendar days prior to day D, unless otherwise agreed with debtor	14 calendar days prior to day D, unless otherwise agreed with debtor	14 calendar days prior to day D, unless otherwise agreed with debtor	14 calendar days prior to day D, unless otherwise agreed with debtor
Refund rights	8 weeks after D (13 months for unauthorised debits)	8 weeks after D (13 months for unauthorised debits)	Businesses: none (13 months for unauthorised debits))	Consumers: 8 weeks after D Businesses: 8 weeks after D (13 months for unauthorised debits)	Businesses: none (13 months for unauthorised debits)



Scheme	CSB N19	SEPA Direct Debit Core	SEPA Direct Debit Business to Business	SEPA Direct Debit Core	SEPA Direct Debit Business to Business
Returns (by debtor bank)	D+5	From D to D+5	From D to D+2	From D to D+5	From D to D+2
Reversals (by creditor)	Na	From D to D+5	From D to D+5	From D to D+5	From D to D+5
Clearing and settlement	National clearing	EBA STEP2	EBA STEP2	EBA STEP2	EBA STEP2

<sup>\*</sup>Cut-off times are applicable for those formats/channels that support legacy scheme in the country.

#### Reason code usage

At the time of writing all reason codes to be used in exception handling R-transactions, as set out in the SEPA rulebook, can be used in Spain.

# **Exception handling of legacy Direct Debit collections**

At the time of writing, the rules for post-migration handling of R-messages related to legacy direct debit collections have not yet been established. This is currently under investigation in the local bank community.

## **Mandate management**

# **Legacy mandate migration**

In Spain creditors may hold paper, electronic or telephonic mandates. All valid legacy mandates can be migrated to the SDD Core Scheme. Use of the SDD Business to Business Scheme requires a new SEPA-compliant mandate.

The migration rules only apply to recurrent direct debits previously processed in the legacy schemes.

## **First SDD Core Collection Instruction**

Since at least the first collection should have been processed before the migration, only recurrent collection type is allowed for migrated direct debit. As consequence, the value for the ISO 20022 XML field <SeqTp> transaction type will be 'RCUR'.



Do note that whereas Norma 19 allowed 640 characters in the Direct Debit Remittance Information field, the SEPA field allows only 140. To avoid losing important reporting data, be careful not to exceed the maximum length.

The Spanish alphabet includes characters which are not allowed in the SEPA Schemes. The below tables illustrates how to transpose them into your SEPA collection message:

Character used in legacy scheme	Character to be used in SEPA scheme
Ñ,ñ	N,n
Ç,ç	C,c
Any other value which is not allowed in ISO 20022 XML	0 (zero)

In Spanish legacy schemes, the Unique Mandate Reference has 12 characters. The SEPA Schemes have a maximum of 35. When using the Norma 19.14 or 19.44 (formato plano) you are allowed to extend the 12 characters to 35 with blanks (Blancos). However, when using the ISO 20022 XML Pain 008.001.02 message type, the length of the field Unique Mandate Reference <Mndtld> equals the number of characters used. Blanks or spaces at the beginning of the field will be considered as part of the reference.

For migration purposes, you should use the signature date of 31 October 2009 to indicate a collection based on a legacy mandate.

## **Additional mandate requirements**

Mandate	Norma 19 Fields	SDD Fields
Unique Mandate Reference	Mandatory	Mandatory – should be reused
Name of the debtor	Mandatory	Mandatory
Address of the debtor	Optional	Optional
Postal code/city of the debtor	Optional	Optional
Debtor's country of residence	Optional	Optional
Debtor's account number IBAN	Legacy account ('CCC') used instead	Mandatory
The BIC code of the debtor bank	Not applicable	Mandatory
Creditor company name	Mandatory	Mandatory
Creditor's identifier	Mandatory	Mandatory



Mandate	Norma 19 Fields	SDD Fields
Creditor's address street and number	Optional	Optional
Creditor's postal code and city	Optional	Optional
Country of the creditor	Not applicable	Optional
Type of payment	Recurrent mainly	Mandatory – one-off allowed
Signature place	Optional	Optional
Date and signature(s)	Mandatory	Mandatory
Additional attributes for information only:		
Debtor identification code	Not applicable	Optional
Name of the Debtor Reference Party	Optional	Optional
Identification code of the Debtor Reference Party	Not applicable	Optional
Name of the Creditor Reference Party	Not applicable	Optional
Identification code of the Creditor Reference Party	Not applicable	Optional
Underlying contract identifier	Not applicable	Optional
Contract description	Optional	Optional

RBS offers you translation and enrichment of your legacy mandates to SEPA standards, as well as a full life cycle mandate management tool, as part of RBS SEPA Accelerator. To learn more about these services please contact your RBS representative.



Contact your local RBS representative for more information or visit www.rbs.com/sepa

No representation, warranty, or assurance of any kind, express or implied, is made as to the accuracy or completeness of the information contained in this document and no member of the RBS Group accepts any obligation to any recipient to update or correct any information contained herein. The information in this document is published for information purposes only and does not constitute an analysis of all potentially material issues. Views expressed herein are not intended to be and should not be viewed as advice or as a recommendation. You should take independent advice in respect of issues that are of concern to you.

This document does not constitute an offer to buy or sell any investment, and nor does it constitute an offer to provide any products or services that is capable of acceptance to form a contract. The products and services described in this document may be provided by any member of the RBS Group, subject to signing appropriate contractual documentation. No member of RBS shall be liable for any direct, indirect, special, incidental, consequential, punitive or exemplary damages, including lost profits arising in any way from the information contained in this communication.

The Royal Bank of Scotland plc. Registered in Scotland No. 90312. Registered Office: 36 St Andrew Square, Edinburgh EH2 2YB. The Royal Bank of Scotland plc is authorised and regulated by the Financial Services Authority. The Royal Bank of Scotland N.V is authorised by De Nederlansche Bank (DNB) and is regulated by the Autoriteit Financiele Markten (AFM) for the conduct of business in the Netherlands. The Royal Bank of Scotland plc is in certain jurisdictions an authorised agent of The Royal Bank of Scotland N.V. and The Royal Bank of Scotland N.V. is in certain jurisdictions an authorised agent of The Royal Bank of Scotland plc.

Copyright 2013 RBS. All rights reserved. This communication is for the use of intended recipients only and the contents may not be reproduced, redistributed, or copied in whole or in part for any purpose without RBS's prior express consent