

Council on General Affairs and Policy – March 2020

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| Document | Preliminary Document <input checked="" type="checkbox"/> Information Document <input type="checkbox"/> | Prel. Doc. 11 of November 2019 |
| Title | Report of the Experts' Group on international transfers of maintenance funds | |
| Author | Permanent Bureau | |
| Agenda item | Item IV-1-b | |
| Mandate(s) | C&R No 30 of CGAP 2019 | |
| Objective | To present the findings of the Experts' Group and to inform about its next steps | |
| Action to be taken | For Approval <input type="checkbox"/> For Decision <input checked="" type="checkbox"/> For Information <input checked="" type="checkbox"/> | |
| Annexes | Annex I: Conclusions and Recommendations adopted by the Experts' Group Annex II: Updated Background Note | |
| Related documents | - "Research in advance of a possible Experts' Group on international transfers of maintenance funds", Prel. Doc. No 11 of December 2018 for the attention of the Council on General Affairs and Policy - "Transfer of funds and the use of information technology in relation to the international recovery of child support and other forms of family maintenance", Prel. Doc. No 9 of May 2004 for the attention of the Special Commission of June 2004 on the international recovery of child support and other forms of family maintenance | |

1. Members will find in Annex I the Conclusions and Recommendations that were adopted by the Experts' Group following its first meeting at the Permanent Bureau (PB) in the Hague in September 2019. This document is followed in Annex II by the updated Background Note that was prepared for the September 2019 meeting.

2. As reflected in Conclusion and Recommendation No 12 of the September 2019 meeting, the Experts' Group agreed to "develop different scenarios involving bundled payments and individual payments that would be reviewed by TransferWise and ING [other financial institutions will also be consulted] to compare, among other things, the cost implications". With a view to developing such scenarios, the PB requested, in October 2019, information on both the number and amount of outgoing and incoming payments handled by Central Authorities from the following jurisdictions: Australia, Brazil, Finland, France, Germany, Netherlands, Norway, Ontario, Poland, Portugal, Slovakia, Sweden, Switzerland, United States of America. This will provide crucial data for the PB to prepare scenarios involving the actual amounts of child support being transferred internationally, with variables such as bundling payments or individual payments. The intention is then for the PB to discuss such scenarios in early 2020 on a trial basis with interested financial institutions in order to evaluate potential savings and organisational implications.

3. In view of the Experts' Group's recommendations for the continuation of its work (Conclusions and Recommendations No 15 onwards), CGAP is invited to approve that:

- a. the Experts' Group continue its work (including meetings through videoconference);
- b. the Special Commission on the practical operation of the 2007 Child Support Convention and the 2007 Maintenance Obligations Protocol, if approved by CGAP, also discuss the topic of international transfers of maintenance funds; and
- c. the PB continue monitoring innovations in the field of international payments.

4. Furthermore, the PB would like to draw CGAP's attention to the following:

- a. Membership of the Experts' Group remains open. To ensure the widest possible representation, any contributions or proposals from States which have not yet participated in the work of the Experts' Group are always welcome.
- b. States Parties to the HCCH 2007 Child Support Convention are invited to update their Country Profile in relation to payment information (Part V, 1.) and their implementation of Article 6(2)(d)-(f) (Part I, 6.).

ANNEXES

**Experts' Group on international transfer of maintenance funds
The Hague, 16-18 September 2019**

Conclusions and Recommendations

Introduction

At its meeting from 5 to 8 March 2019, the Council on General Affairs and Policy (CGAP) of the Hague Conference on Private International Law (HCCH) approved the establishment of an Experts' Group (EG) on international transfer of maintenance funds (see Conclusion & Recommendation No 30 of CGAP 2019).

The meeting of the EG took place from 16 to 18 September 2019 at the Permanent Bureau of the HCCH in The Hague. It was attended by experts from Australia (via teleconference), Brazil, Canada, the European Union, France, Germany, the Netherlands, Norway, Poland, Portugal, Switzerland and the United States of America. Experts from the Deutsche Bundesbank, National Child Support Enforcement Association, TransferWise and ING also attended.

The EG benefitted from written contributions that were submitted prior to the meeting by Australia, Bulgaria, Canada, Croatia, Estonia, Finland, Norway, Poland, the Slovak Republic, Switzerland, the United Kingdom and the United States of America to prepare a Background Note for the purpose of the meeting.

The EG elected Mr Arnaldo José Alves Silveira, General Coordinator for International Legal Cooperation at the Ministry of Justice and Public Security in Brazil, as Chairperson.

Background to the discussions

A. Members of the EG came together to learn from each other and identify good practices regarding the cross-border transfer of funds. Members of the EG also discussed different ways to facilitate the cross-border transfer of funds with a view to identifying possible solutions that are low cost, cost-effective, transparent, prompt, efficient and accessible.

B. The EG acknowledged the diversity of models for child support recovery such as direct transfers from the debtor to the creditor, transfers through an institution in the requested State (*e.g.*, bailiff and other enforcement authorities, court and / or Central Authorities) and sometimes through an institution in the requesting State (*e.g.*, public body and / or Central Authorities). It was recognised that the involvement of Central Authorities and the degree of centralisation of payments vary according to different legal systems, domestic and regional banking systems and available means.

C. In that context, the EG discussed the implementation and operation of Articles 6(2)(d)-(f), 8, 35 and 43 of the *HCCH Convention of 23 November 2007 on the International Recovery of Child Support and Other Forms of Family Maintenance* (hereafter the 2007 HCCH Child Support Convention).

D. It was recognised that large amounts of child support are currently transferred internationally but also that difficulties persist related to high and non-transparent bank fees and / or currency conversion costs, loss of payment data between different payment formats, occasional communication problems between Central Authorities and lack of payments monitoring. In particular, it was underlined that the use of cheques is a major problem.

E. It was noted that the solutions and good practices discussed in the context of the 2007 HCCH Child Support Convention are equally relevant to the *United Nations Convention of 1956 on the Recovery Abroad of Maintenance Obligations*, Council Regulation (EC) No 4/2009 of 18 December 2008 on jurisdiction, applicable law, recognition and enforcement of decisions and cooperation in matters relating to maintenance obligations, other regional or bilateral instruments.

F. It was underlined that effectively implementing the 2007 HCCH Child Support Convention would help States reach the United Nations Sustainable Development Goal No 16.3 (Rule of Law) as it assists parents with meeting their child support obligations in a cross-border context.

The EG agreed by consensus on the following Conclusions and Recommendations:

Cheques

1. Experts acknowledged that eliminating the use of cheques was a worthwhile goal, after an appropriate transition period, considering that certain States can no longer receive cheques or are under time constraints to stop using them.

Transfer costs

2. All participants agreed that there is a need to find solutions for the international transfer of funds which would result in increased transparency and cost reduction. Creditors should not bear the costs related to the transfer of funds. Consideration should be given to explore a future solution where the institution(s) facilitating the transfer of funds could cover the costs of such transfers by withholding the amounts for a few days.

3. A good practice is for the requested Central Authority to have arrangements with their bank to cover the fees (“details of charges: OUR”) and for the requested Central Authority to obtain confirmation from the requesting Central Authority that the amount received is the same as the amount sent and, where applicable, information on the reasons for any difference.

Centralised point for international transfers

4. Consideration should be given by each Contracting State to establish a centralised point for international transfers dedicated to both incoming and outgoing transfer of funds. Such centralised point could be as basic as a bank account. When possible, this bank account could be held with a public institution such as a central bank.

5. The value of such centralised point was underlined as it could:

- help with the standardisation of the international transfer of funds;
- increase transparency with regard to the costs of such transfers;
- reduce the costs associated with such transfers;
- assist the Central Authority in the monitoring of payments;
- simplify and accelerate the transfer of funds where payments are limited or need to be screened for regulatory purposes.

Consideration should be given to providing payment transfer services to any debtors transferring payments within the scope of the 2007 HCCH Child Support Convention.

Monitoring of payments

6. The monitoring of payments could:

- ensure an accurate payment record;
- assist with the enforcement of payments;
- support communication between Central Authorities to reconcile the amounts sent and received;
- help establish statistical reports, *e.g.*, to measure efficiency and increase understanding about money flows.

Data accompanying the transfer

7. Consideration should be given to using unique case references, known to both the requesting and requested State, attached to each transfer of funds. Such unique case references would link the transfer to an existing case. Consideration should be given, where possible, to use the iSupport case reference.

Currency conversion

8. Reference was made to the *Practical Handbook for Caseworkers under the 2007 Child Support Convention* (hereinafter *Caseworkers Practical Handbook*)¹ in which it is stated that the good practice is where the currency conversion of payments be done by the relevant authority in the requested State at the time of transfer.

9. Reference was also made to the *Caseworkers Practical Handbook* in which it is stated that the maintenance debt is paid in full only if the full amount owed in the currency set out in the original maintenance decision has been paid.

10. A good practice should be to promote transparency of currency conversion costs.

Bundled payments

11. It was noted that bundled payments do result in savings on transfer costs, but may involve some delay resulting from processing time. It was noted that automation can alleviate these delays and could require fewer resources.

Existing solutions

12. The EG was grateful to the experts from TransferWise and ING for their useful presentations, explanations of their business models, and responses to questions on the use of blockchain and other payment transfer solutions. The EG welcomed the offer made by the experts from TransferWise and ING to provide assistance to the EG in their consideration of different international transfer of funds models. The EG agreed to develop different scenarios involving bundled payments and individual payments that would be reviewed by TransferWise and ING to compare, among other things, the cost implications.

Follow-up

13. It was recommended that the EG continue its work and meet on a regular basis through video and / or teleconference to share good practices, experiences implementing the above good practices and solutions and to continue the exploration and implementation of additional solutions.

¹ Permanent Bureau of the Hague Conference on Private International Law, *Practical Handbook for Caseworkers under the 2007 Child Support Convention*, 1st ed., The Hague, 2013, at p. 174. Available at < www.hcch.net > under “Child Support Section”, then “HCCH publications”.

14. States Parties to the 2007 HCCH Child Support Convention should ensure that their Country Profile is up to date in relation to payment information (Part V, 1.) and their implementation of Article 6(2)(d)-(f) (Part I, 6.).
15. The membership of the EG remains open. Any contributions or proposals from States which have not yet participated in the work of the EG are always welcome.
16. The Permanent Bureau will continue to monitor innovations in this area.

BACKGROUND NOTE

**FIRST MEETING OF THE EXPERTS' GROUP ON
INTERNATIONAL TRANSFER OF MAINTENANCE FUNDS**

proposed by the Permanent Bureau

*Document for the attention of the Experts' Group on
international transfer of maintenance funds
(meeting of 16 -18 September 2019)*

Background note

I. Introduction

1. The *HCCCH Convention of 23 November 2007 on the International Recovery of Child Support and Other Forms of Family Maintenance* (2007 Convention) put in place rules for recognition and enforcement of decisions as well a system of administrative cooperation using a network of Central Authorities to provide assistance with applications for the international recovery of child support and other forms of family maintenance. Today, 41 Contracting Parties are bound by this Convention. It contains specific provisions related to maintenance payments. Article 6 (2)(f) of the Convention states that, in relation to the applications they receive, Central Authorities shall take appropriate measures “to facilitate the collection and expeditious transfer of maintenance payments”. In addition, Article 35 “Transfer of funds” states:

“(1) Contracting States are encouraged to promote, including by means of international agreements, the use of the most cost-effective and efficient methods available to transfer funds payable as maintenance.

(2) A Contracting State, under whose law the transfer of funds is restricted, shall accord the highest priority to the transfer of funds payable under this Convention.”

2. In March 2018, the Council on General Affairs and policy (CGAP) of the HCCCH instructed the Permanent Bureau (PB) to update existing research on international transfers of maintenance funds. This followed a request from a Member, which remarked that an increasing number of authorities were no longer able to accept cheques as child support payments.

3. This resulted in the draft by the PB of Preliminary Document No 11² (Prel. Doc. No 11), which presented the experience of Central Authorities in relation to international payments before providing updated material on means of international transfers of funds and suggesting some possible directions for an Experts’ Group. Prel. Doc. No 11 emphasised the diversity of models for the recovery and disbursement of maintenance funds. It also remarked that regulation has made it easier to transfer funds abroad, at least within the European Union. However, the document also highlighted that it can remain expensive to transfer small amounts of money abroad, even though increased competition and new technology hopefully point to savings for customers.

4. The 2019 CGAP approved the establishment of an Experts’ Group on international transfers of maintenance funds, with the primary task to produce an inventory of good practices. In preparation for the September 2019 meeting of this group, the PB invited HCCCH Members to submit descriptions of solutions that they already have in place to facilitate the transfer of international maintenance.

5. The purpose of this background note is to assist the discussion at the September 2019 meeting, as a complement to Prel. Doc. No 11. It presents recent developments in international payments as well as responses that were received from Members. Finally, the document provides an update to the possible topics for discussion that were suggested in Prel. Doc. No 11.

² “Research in advance of a possible Experts’ Group on international transfers of maintenance funds”, Prel. Doc. No 11 of December 2018 for the attention of the Council on General Affairs and Policy, available on the HCCCH website < www.hcch.net > under the Governance section then Council on General Affairs and Policy. This document is an update of “Transfer of funds and the use of information technology in relation to the international recovery of child support and other forms of family maintenance”, Prel. Doc. No 9 of May 2004 for the attention of the Special Commission of June 2004 on the international recovery of child support and other forms of family maintenance, available on the HCCCH website < www.hcch.net > under the Child Support section then Preliminary Documents.

II. Recent developments in international payments

6. In the European Union (and EEA), Regulation 2019/518³ now enables payers to be better informed when it comes to currency conversions: payment service providers must clearly inform the payer of the estimated charges for currency conversion services applicable to a credit transfer. Payment service providers must also clearly communicate to the payer the estimated total amount of the credit transfer in the currency of the payer's account, including any transaction fee and any currency conversion charges. They must also communicate the estimated amount to be transferred to the payee in the currency used by the payee. These provisions will apply from 16 April 2020.

7. In the USA, the Federal Reserve announced on 5 August 2019 that it would build a real-time interbank payment system, "FedNow", to be rolled out from 2023. This is meant to cover all banks in the USA, in addition to another system, The Clearing House (tch), which is owned by 25 large banks.⁴

8. Much press was devoted to the announcement by Facebook on 18 June 2019 that it would launch a digital currency within a year. The currency, called Libra, would allow individuals to spend and transfer money cross-border with close to zero transaction fees. Libra is therefore partly targeted at the \$ 613 billion market for cross-border remittances.⁵ So far, the project has received backing from 28 prospective founding members including financial firms, online services, cryptocurrency wallets, venture capitalists and charities, but no banks.⁶ It remains to be seen whether Libra will get off the ground, as regulators in several countries have voiced concerns that it would allow a private company to set up the equivalent of a national currency. At the time of writing, several founding backers were considering withdrawal from the project in the face of increased scrutiny from State authorities.

9. Initiatives using blockchain such as Ripple (see Prel. Doc. No 11) have also continued to receive attention and to display their ambitions.⁷ However, doubts are still raised by traditional stakeholders of the international payment system as to its economic viability and fitness for purpose. For instance, the German Bundesbank concluded after a trial project using blockchain to transfer and settle securities and cash that it proved more costly and less speedy than the traditional way.⁸

10. As described in Prel. Doc. No 11, new entrants are offering solutions to transfer money across borders more cheaply than banks, which face the increasing costs of compliance with anti-money laundering rules. They are therefore trying to increase their oversight by reducing their network of correspondent banks, which support most international payments.⁹ The number of active correspondent relationships between banks fell by 16% in the six years to 2018.¹⁰ Banks are therefore faced with regulatory pressure and competition but remain, however, the most trusted type of company to securely manage their clients' data,¹¹ in comparison with other payment providers, mobile network operators, retailers, internet providers and social media.

³ Regulation (EU) No 2019/518 of the European Parliament and of the Council of 19 March 2019 amending Regulation (EC) No 924/2009 as regards certain charges on cross-border payments in the Union and currency conversion charges. Prel. Doc. No 11 already mentioned Regulation No 924/2009, which raised the threshold up to which banks must apply the same charges for domestic and cross-border electronic payment transactions in euros to € 50,000. States outside the euro area may also extend the application of this Regulation to their national currency.

⁴ "Overdue", *The Economist*, 10 August 2019.

⁵ MURPHY Anna, "What is Libra, Facebook's new digital coin", *Financial Times*, 18 June 2019.

⁶ "Coin flip", *The Economist*, 20 June 2019.

⁷ <https://www.bloomberg.com/news/articles/2018-11-13/ripple-is-destined-to-overtake-swift-banking-network-ceo-says> (last consulted on 13 November 2019).

⁸ <https://ftalphaville.ft.com/2019/05/29/1559146404000/Blockchain-officially-confirmed-as-slower-and-more-expensive/> (last consulted on 29 May 2019).

⁹ See Prel. Doc. No 11, para. 21.

¹⁰ "Special FX", *The Economist*, 11 April 2019.

¹¹ Poll quoted in WOLF Martin, "Facebook enters dangerous waters with Libra cryptocurrency", *Financial Times*, 26 June 2019.

III. Summary of responses to 2019 survey

11. Prel. Doc. No 11 identified two major models when it comes to international payments of maintenance:

- A decentralised model, with payment directly from an enforcement authority or the debtor to the creditor or a representative. This method is the prevailing model among Contracting Parties to the 2007 Convention which have filled in a country profile.
- A centralised model, with funds going through the requesting Central Authority(ies) or another public organisation. This is the case in the USA with the State Disbursement Units, in Norway with the Collection Agency of the Labour and Welfare Administration, as well as in Australia.

Some States also have a hybrid model, with payments made either through the requesting Central Authority or directly to the creditor. This is the case in the Czech Republic. In fact, this model may, in practice, be more widespread as some States with a decentralised model may nevertheless allow payments to be made directly to a public body which is subrogated to the creditor. The best practices and possible solutions discussed by the group must be relevant to all models.

12. Responses in reply to the PB's request were received from the following countries, representing the two main models highlighted above: Australia, Bulgaria, Canada, Croatia, Estonia, Finland, Norway, Poland, the Slovak Republic, Switzerland, the United Kingdom and the United States of America (USA). In its reply, the Slovak Republic notes the following benefits for the transfer of funds through the requesting Central Authority: the capacity to monitor the regularity and amount of payments as well as the bank fees and exchange rates. The requesting Central Authority is also better placed than the parties to interact with foreign correspondents in case of problems.

A. Use of cheques

13. Several respondents (Estonia, Finland, Poland, the Slovak Republic and Switzerland) mention the high cost of cheques, and indicate that their banks either no longer accept them or will stop doing so in the near future. Finland indicates receiving 800 cheques per year (mostly from the USA and Australia) and highlights the costs of processing and the risks that cheques may be lost in transit. For Canada, cheque is still the most common international payment method: a cheque may cost C\$ 5 to produce, whereas a bank transfer may cost up to C\$ 15-25. In the USA, most states send child support payments to other States by cheque only. Very few states in the USA can receive incoming international bank transfers. Finally, some States also restrict the receipt of cheques in certain currencies, as Norway reports that it cannot issue cheques in Norwegian kroner to a few States.

B. Reported issues

14. Two main types of difficulties are reported by respondents: those that are of an organisational nature and those that are linked to the international payment system. Among the latter, in addition to the high cost of cross-border bank transfers, is that relevant information is often missing from foreign payments. Three respondents also mention instances where transfers are stopped by banks while they check for compliance with sanctions and anti-money laundering rules. In this respect, the USA notes that its child support programmes are required by financial institutions to provide additional specific information about any international recipient of a payment. Such specific information on individual recipients is not contained in automated American child support systems and the necessary modifications have so far only been undertaken by one state in the USA. In addition, maintaining additional personal information raises concerns in terms of ensuring the accuracy of the information over time. In contrast to payments to an individual, child support payments to a foreign Central Authority should not require screening and can therefore be more easily managed.

15. Organisational difficulties include obtaining the bank details of applicants. The Slovak Republic reports that it can be difficult, time consuming or even impossible. Norway also reports that it can be difficult to know whom to contact in case of questions about a specific payment, particularly in relation to payments from public authorities. The same communication issues also affect the ability to know in which currency to effect a transfer (in case the creditor has several accounts) and the capacity to use the correct address to send information about bundled payments (see below para. 19). Australia also mentions a diversity of banking services and system requirements that can be difficult to navigate. For instance, a cheque issued in Australia is valid for 15 months, whereas in some European countries a cheque is valid for 20 days.

c. Solutions put in place by respondents and suggested best practices

16. Confronted with the challenges of the transfer of money abroad, national authorities have come up with a number of pragmatic solutions. The first obvious solution, as highlighted by several respondents, is to be able to rely on national points of contact when in need of information. Among Central Authorities that handle payments, several have established relationships with banks or payment providers in their own State. Figures shared by one respondent, although they cannot be published, indicate that the cost of sending and receiving payments in foreign currencies is not negligible (over € 30,000 per year for under 19,000 child support payments per year).

17. Switzerland, which has experience with several pragmatic solutions, highlights that, while international bank transfers can involve considerable fees, they remain the least costly option in comparison with more time-consuming solutions. In two instances, Switzerland has involved its National Bank with receiving payments from abroad. The first involves Swiss embassies in the USA and Canada, where payments are received and treated before being sent to the National Bank account of the Swiss Central Authority. Instructions can then be given to transfer the individual amount to the individual case. The other instance concerns payments received from Australia, which are directly sent to the Swiss National Bank and then despatched according to instructions from the Swiss Central Authority. As with the issue of debit cards to creditors, Switzerland emphasises that these are all temporary, resource-intensive solutions.

18. Several respondents report having opened bank accounts abroad, although Sweden closed its accounts in Germany and the United Kingdom and now only refers debtors to an account in Sweden and an account in Finland. Norway points out that opening an account in the USA has led to reduced costs and to custodial parents receiving payments more quickly. Noting the positive experience of the Netherlands and Norway, the USA is offering to assist other States in opening US bank accounts.

19. Bundling several individual payments into one larger payment is also one solution experienced by several respondents. Information detailing the individual payments is sent separately. Finland has put in place such a system with Australia. Australia has developed spreadsheets for each State to which international electronic fund transfers are made, with a degree of automation. Once the funds are remitted to the relevant international authority, a spreadsheet advising the payment is sent by secure email with details for the allocation to each child support case. Norway has a similar arrangement with Australia and Denmark. They exchange the list of payments through a website. Switzerland remarks that such bundled payments must occur with sufficient frequency in order not to inconvenience recipients. They can therefore only be put in place between States where there is a certain number of cases, so that regular payments are economical. In Poland, bailiffs can also, with the creditor's consent, accumulate funds to issue bundled payments in order to circumvent the high costs associated to the international transfer.

20. If the amount of information that needs to be attached to a payment, such as debtor or case number, varies among States, Sweden has put in place a solution that helps to match a payment with a case, for debtors who have a Swedish bank account. Bankgiro is a communication system for processing payment assignments via the Internet, directly to and from an accounting system. In this respect Finland also suggests that payments should be made as account-to-account transfers using

SWIFT and BIC and quoting a reference whenever possible, with each payment made for a specific purpose and client.

21. One long-term solution is mentioned by the USA, which has completed a feasibility study on a central international payment solution. Such a facility would eliminate the need for states in the USA to make changes to their automated child support case management systems (see above para. 14). It would also facilitate the negotiation of lower fees and better currency conversion rates with banks, as well as the provision of multiple payment options.

22. Only two respondents wrote about their experience with currency conversions. In this respect one can wonder whether the use of bank transfers, by providing for a shorter time between the emission, the processing and the reception of a payment, has alleviated the risk of currency fluctuations. However, Sweden points the need for a dynamic system where the exchange rate of the home currency is adjusted to account for fluctuations of the debtor's currency over the course of a case.

IV. Possible topics for discussion by the Experts' Group

23. Market pressure, regulatory developments and technological change all contribute to progressively making it easier to transfer funds abroad. In the field of remittances, this is recognised by United Nations Sustainable Development Goal 10C: *"by 2030, reduce to less than 3 per cent the transaction costs of migrant remittances and eliminate remittance corridors with costs higher than 5 per cent"*.¹²

24. However, as evidenced by the respondents' replies, organisational and technical obstacles remain when it comes to ensuring the smooth transfer of international maintenance funds. In the light of their experience and requests, the following topics could be discussed by the Experts' Group:

- The role of Central Authorities or other public institutions in the international transfer of funds (including transfers as part of amicable solutions);
- Mapping of issues that occur at each level on centralised models (between debtor and Central Authority / enforcement authority, between the latter and the creditor) and on hybrid and decentralised models;
- Provision of up-to-date information (Country Profiles and contact points);
- Suggestion of a minimum data set for reference data accompanying international transfers;
- Guidelines for the proper allocation of fees charged for international transfers and how to account for those fees in the case balance;
- Information provided to debtors and creditors concerning transfer of fund processes;
- Possibility to offer an exception to the non-acceptance of cheques for States which have few international cases or are unable to adopt electronic bank transfers;
- Interoperability between different payment formats (including intermediaries and correspondent banks);
- Currency fluctuations and frequency of adjustments;
- Experience of users of foreign bank accounts, in particular when it comes to the reconciliation of accounts;

¹² The World Bank has a specific project on this issue (<https://remittanceprices.worldbank.org/en>), in partnership with the Bank for International Settlements (BIS). Both the World Bank and the BIS were unsuccessfully contacted by the PB.

- Use of a single entry point for international transfers;
- Possible experience that participants have had with non-traditional banks and other platforms;
- Compliance with international money laundering and terrorism financing regulations;
- Dialogue with banks and other institutions to reduce fees for child maintenance transfers (including the possibility to extend EU Regulation No 924/2009 to non-euro countries in the EU and EEA) and ensure there is no loss of information.