

**Guideline 8B: Submitting SWIFT Electronic Funds
Transfer Reports to FINTRAC**

Guideline 8B: Submitting SWIFT Electronic Funds Transfer Reports to FINTRAC

February 2006

This, along with the new *Guideline 8A: Submitting non-SWIFT Electronic Funds Transfer Reports to FINTRAC Electronically* and new *Guideline 8C: Submitting non-SWIFT Electronic Funds Transfer Reports to FINTRAC by Paper*, replaces the previous version of *Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC* issued in November 2004. The changes made to this version are indicated by a side bar to the right of the modified text.

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1 General

The following have to report electronic funds transfers (EFTs) to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC):

- financial entities (such as banks or authorized foreign banks with respect to their operations in Canada, credit unions, caisses populaires, trust and loan companies and agents of the Crown that accept deposit liabilities);
- foreign exchange dealers (persons and entities engaged in the business of foreign exchange dealing); and
- money services businesses (including alternative remittance systems, such as Hawala, Hindi, Chitti, etc.).

If you are one of these “reporting entities”, this guideline has been prepared by FINTRAC to help you submit EFT reports. It explains reporting timelines, how reports have to be sent to FINTRAC, and what information has to be included in these reports.

For guidance on who is engaged in the business of money services or foreign exchange dealing, refer to the FINTRAC Interpretation Notice on this topic available from the Publications area of FINTRAC’s Web site.

This guideline uses plain language to explain the most common reporting situations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (the Act) as well as the related Regulations. It is provided as general information only. It is not legal advice, and is not intended to replace the Act and Regulations. For more information about money laundering, terrorist financing or other requirements under the Act and Regulations, see the guidelines in this series:

- *Guideline 1: Backgrounder* explains money laundering and terrorist financing and their international nature. It also provides an outline of the legislative requirements as well as an overview of FINTRAC’s mandate and responsibilities.
- *Guideline 2: Suspicious Transactions* explains how to report a suspicious transaction. It also provides guidance on how to identify a suspicious transaction, including general and industry-specific indicators that may help when conducting or evaluating transactions.
- *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC* explains when and how to submit suspicious transaction reports. There are two different versions of Guideline 3, by reporting method.
- *Guideline 4: Implementation of a Compliance Regime* explains the requirement for reporting persons and entities to implement a regime to ensure compliance with their obligations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and associated Regulations.
- *Guideline 5: Submitting Terrorist Property Reports to FINTRAC* explains to reporting persons and entities when and how to submit a terrorist property report.
- *Guideline 6: Record Keeping and Client Identification* explains the requirement for reporting persons and entities to identify their clients and keep records. There are eight different versions of Guideline 6, by sector.

- *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC* explains when and how to submit large cash transaction reports. There are two different versions of Guideline 7, by reporting method.
- *Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC* explains when and how to submit electronic funds transfer reports. There are three different versions of Guideline 8, by report type and reporting method.
- *Guideline 9: Submitting Alternative to Large Cash Transaction Reports to FINTRAC* explains when and how financial entities can choose the alternative to large cash transaction reports. This is only applicable to financial entities.

If you need more help after you read this or other guidelines, call FINTRAC's national toll-free enquiries line at 1-866-346-8722.

Throughout these guidelines, several references are provided to additional information that may be available on external Web sites. FINTRAC is not responsible for the accuracy or reliability of the information contained on those external Web sites. The links provided are based on information available at the time of publishing of this guideline.

Throughout this guideline, any references to dollar amounts (such as \$10,000) refer to the amount in Canadian dollars or its equivalent in foreign currency. Also throughout this guideline, the term "reporting entity" refers to any person or entity required to report to **electronic funds transfers** to FINTRAC.

2 Electronic Funds Transfer Reporting Requirements

2.1 FINTRAC Enrolment

Effective February 2006, as a reporting entity, you have to be enrolled with FINTRAC for electronic reporting. FINTRAC will provide you with an identifier number to include in your reports.

If you were already submitting reports to FINTRAC before February 2006, your enrolment should be processed automatically. If you have previously reported, but have not received your identifier number before February 2006, please contact FINTRAC (as explained in Section 6).

If you have never reported to FINTRAC, please contact FINTRAC (as explained in Section 6) to enrol before you report.

For more information about FINTRAC enrolment, contact us as explained in Section 6.

2.2 When Do You Have to Report Electronic Funds Transfers?

If you are a financial entity, a money services business or a foreign exchange dealer, you have to report certain international EFTs to FINTRAC. This guideline explains the reporting

requirements related to SWIFT EFTs. If you send EFTs other than those explained below, read *Guideline 8A: Submitting non-SWIFT Electronic Funds Transfer Reports to FINTRAC Electronically*.

2.3 SWIFT Electronic Funds Transfers

The SWIFT EFT reporting requirement is only applicable to you if you send EFTs by transmission of a **SWIFTMT 103 message**, as a SWIFT member, through the SWIFT network. SWIFT means the Society for Worldwide Interbank Financial Telecommunication. It is a co-operative owned by the international banking community that operates a global data processing system for the transmission of financial messages.

Note: A reportable EFT includes the SWIFT MT 100 message. However, this type of message was removed from the SWIFT network in November 2003. If you need to send a report about this type of message, contact FINTRAC.

You have to send a SWIFT EFT report to FINTRAC for the following transactions:

Outgoing EFTs.

These are SWIFTMT 103 messages for \$10,000 or more sent outside Canada at the request of a client in the following manner:

- in a single transaction; or
- in two or more transfers of less than \$10,000 each (that total \$10,000 or more) in the following situations:
 - if you are an entity, your employee or senior officer knows the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity; or
 - if you are an individual, you know the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity.

This type of EFT requires that you send an outgoing SWIFT EFT report to FINTRAC. These reports can only be sent electronically, by batch, as explained in Section 3.

It can happen that a client requests a transfer of funds and, instead of sending the EFT yourself, you order someone else that is a financial entity, a money services business or a foreign exchange dealer in Canada to send it. In this case, you have to make the related non-SWIFT EFT report (EFTO) to FINTRAC **unless** you provide that other reporting entity with the client's name and address. In other words, if you give them your client's name and address, you do not have to report the EFT. See Appendix 2 for example scenarios of this type of situation.

Incoming EFTs.

These are SWIFTMT 103 messages for \$10,000 or more that you receive and that are sent from outside Canada at the request of a client in the following manner:

- in a single transaction; or

- in two or more transfers of less than \$10,000 each (that total \$10,000 or more) in the following situations:
 - if you are an entity, your employee or senior officer knows the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity; or
 - if you are an individual, you know the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity.

This type of EFT requires that you send an incoming SWIFT EFT report to FINTRAC. These reports can only be sent electronically, by batch, as explained in Section 3.

If you are a financial entity, money services business or foreign exchange dealer and you received instructions for a transfer of funds from outside Canada, you have to make the related incoming EFT report to FINTRAC, even if you have to forward the same instructions to another financial entity, money service business or foreign exchange dealer in Canada. However, if you receive this type of instructions from another financial entity, money services business or foreign exchange dealer in Canada, you do not have to make an incoming EFT report even if the original sender was outside Canada. See Appendix 2 for example scenarios of this type of situation.

2.4 Electronic Funds Transfers in Foreign Currency

If you send an EFT in a foreign currency, you will need to check whether it is the equivalent of 10,000 Canadian dollars or more to determine whether or not it is reportable to FINTRAC. **For this purpose only**, use the last noon exchange rate provided by the Bank of Canada available at the time of the transaction, instead of the actual exchange rate used to process the transaction. This calculation is only to check whether the \$10,000 threshold is met for the transaction to be reportable as an EFT transaction.

For example, for an EFT that happened at 9:00 am on Tuesday following a holiday Monday, you would use the Bank of Canada noon rate from the previous working day (in this case, Friday) to determine whether the transaction is reportable. You can find the noon rate on the Bank of Canada Web site at <http://www.bankofcanada.ca/en/exchange.htm>.

If there is no Bank of Canada noon rate published for the currency of the transaction, use the actual exchange rate applied when you processed the transaction to determine whether it is reportable.

Once you have determined that an EFT in a foreign currency is reportable based on the Bank of Canada noon rate, you will have to send an EFT report to FINTRAC. On the EFT report in Part A, enter the amount of the transaction in the foreign currency. If you converted this amount to or from Canadian dollars when you processed the transaction (other than using the Bank of Canada noon rate to determine whether or not it was reportable), enter the actual exchange rate you used to process the EFT in Part A of the report.

2.5 Other Requirements Associated with Electronic Funds Transfers

In addition to the reporting requirements explained in this guideline, consider the following relating to an EFT transaction:

Record keeping and client identification

EFTs have associated record keeping and client identification requirements. These are explained in *Guideline 6: Record Keeping and Client Identification*.

Large cash transaction report

If an EFT transaction is initiated in cash (in the amount of \$10,000 or more), you will likely have to make a large cash transaction report to FINTRAC in addition to making the EFT report about the transaction as required.

For more information about making large cash transaction reports, consult *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC*.

Suspicious transaction report

If anything about an EFT transaction gives you reasonable grounds to suspect that it could be related to a money laundering or a terrorist activity financing offence, you have to make a suspicious transaction report to FINTRAC about the same transaction. This would be in addition to making the EFT report about the transaction as required.

The suspicious transaction report has many fields that are different from those of an EFT report. For example, there is a field in the suspicious transaction report for you to explain your suspicion about the transaction. There is also a field in that report for you to describe what action, if any, was taken by you, as a result of the suspicious transaction. This would include stating that you have made an EFT report for the same transaction (if that is the case).

For more information about making suspicious transaction reports, consult the following guidelines:

- *Guideline 1: Backgrounder*
- *Guideline 2: Suspicious Transactions*
- *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC*

Transactions related to terrorist property

If you know that any proposed transaction is related to property owned or controlled by or on behalf of a terrorist or a terrorist group, you should not complete the transaction. This is because terrorist property must be frozen under the *United Nations Suppression of Terrorism Regulations* as well as the *Criminal Code*.

For more information about this and to find out what your obligations are regarding any terrorist property in your control or possession, consult the following guidelines:

- *Guideline 1: Backgrounder*
- *Guideline 5: Submitting Terrorist Property Reports to FINTRAC*

2.6 Reporting Timeframes for Electronic Funds Transfer Reports

You have to send EFT reports to FINTRAC no later than five working days after the day of the transfer.

3 Electronic Reporting

3.1 SWIFT EFT Reporting

SWIFT EFT reports can only be sent to FINTRAC electronically, by batch. These reports cannot be made on paper.

3.2 How to Complete Electronic Reports

For the batch file reporting mechanism, you need a public key infrastructure (PKI) certificate and specialized software available from FINTRAC. For more information about batch reporting SWIFT EFTs, consult the specifications document called *SWIFT Batch Reporting Instructions and Specification*. This document is available from the publications area of FINTRAC's Web site (see technical documentation at http://www.fintrac.gc.ca/publications/pub_e.asp). Also refer to the Appendix 1 of this guideline for instructions and details regarding the content of a SWIFT EFT report.

For more information about batch reporting, including how to get a PKI certificate and the specialized software required, refer to the reporting area of FINTRAC's Web site at http://www.fintrac.gc.ca/reporting--declaration/1_e.asp.

3.3 Acknowledgement of Receipt of an Electronic Report

FINTRAC will send you an acknowledgement message when your EFT report has been received electronically. This will include the date and time your report was received and a FINTRAC-generated identification number. Please keep this information for your records.

For the reports you send by batch, you will receive two acknowledgements. The first will confirm that your batch has been received by FINTRAC. The second will confirm that it has been processed.

3.4 Report Corrections

If your EFT report contains incomplete information, FINTRAC may notify you. The notification will indicate the date and time your report was received, the FINTRAC-generated identification number, along with information on the fields that must be completed or corrected.

After receiving FINTRAC's notification, you should provide the necessary information to FINTRAC within the five-working-day reporting deadline. In other words, this information

should be sent to FINTRAC within five working days of the transaction. Your obligation to report will not be fulfilled until you send the **complete** report to FINTRAC.

For more information about this, refer to the *SWIFT Batch Reporting Instructions and Specification*.

4 Instructions for Completing a SWIFT Electronic Funds Transfer Report

4.1 General Instructions

The contents of a SWIFT EFT report depend on whether the report is about an outgoing or incoming transfer. The required information for each type of report is listed in Appendices 1A and B, as follows:

- Outgoing International SWIFT EFT Report (see Appendix 1A)
- Incoming International SWIFT EFT Report (see Appendix 1B)

Based on the reporting requirements for SWIFT EFT reports, information is either mandatory, mandatory where applicable, or requires “reasonable efforts”, as follows:

- **Mandatory:** This information **has to be provided**.
- **Mandatory where applicable:** This information has to be provided if it is applicable to you or the transaction being reported.
- **Reasonable efforts:** For all other information required, you have to make reasonable efforts to get the information. “Reasonable efforts” means that you tried to get the information required in the report. If the information is available to you, you must provide it in the report. If the information was not available at the time of the transaction, and it is not contained in your files or records, the relevant field(s) may be left blank.

The specifications for SWIFT EFT reports do not reflect the mandatory, mandatory where applicable and reasonable efforts fields in the same manner as your other reports to FINTRAC. The SWIFT EFT report specifications reflect “tags” according to the way information is entered to transmit the EFT message based on the SWIFT network rules. In some cases, those rules can be different from what is required in your report to FINTRAC.

Here are some examples to illustrate this point:

Example 1

If there is an intermediary institution for a SWIFT EFT, your report to FINTRAC must contain either the bank identification code (BIC) or the full name and full address of the intermediary. This information is mandatory, if applicable.

In the SWIFT network rules, intermediary information (tag :56:) is optional. Furthermore, for those messages that do involve an intermediary, the SWIFT network

rules provide three options regarding information to be included. However, only two of those options (option A or D) provide the mandatory information for your report to FINTRAC. The other (option C) provides neither the BIC nor the full name and address. This means that a SWIFT EFT message with option C at tag :56: does not provide the mandatory if applicable information for your report to FINTRAC, even if it meets the SWIFT network rules.

Example 2

For your report to FINTRAC, the bank operation code is information that requires reasonable efforts. However, based on the SWIFT network rules, the bank operation code (tag :23B:) is required. This means that you should be providing this information in your report to FINTRAC, because it should be available to you.

For these reasons, tags in the SWIFT EFT report do not use asterisks to demonstrate mandatory fields. The instructions for each tag in the report explain which information is mandatory or mandatory where applicable and which requires reasonable efforts.

As explained in Section 2.3, EFT reports can be about one of multiple EFTs of less than \$10,000 each conducted within 24 consecutive hours of each other that add up to \$10,000 or more. Because those individual EFTs were each under \$10,000, some of the information that is mandatory for the report may not be available in your records or from the time of the transaction. In this case, “reasonable efforts” applies to this otherwise mandatory information.

You have to complete a separate EFT report for each EFT transaction, even if you are reporting multiple EFTs of less than \$10,000.

5 Comments?

These guidelines will be reviewed on a periodic basis. If you have any comments or suggestions to help improve them, please send your comments to the mailing address provided below, or by email to guidelines@fintrac.gc.ca.

6 How to Contact FINTRAC

For further information on FINTRAC and its activities, and report submission, please go to FINTRAC's Web site at <http://www.fintrac.gc.ca> or contact FINTRAC:

Financial Transactions and Reports Analysis Centre of Canada
234 Laurier Avenue West, 24th floor
Ottawa, Ontario
Canada K1P 1H7

Toll-free: 1-866-346-8722

Appendix 1: Contents of SWIFT Electronic Funds Transfer Reports

Appendix 1A:

Contents of an Outgoing SWIFT Message Report

Appendix 1B:

Contents of an Incoming SWIFT Message Report

Appendix 1A: Contents of an Outgoing SWIFT Message EFT Report

This Appendix lists the requirements for an outgoing SWIFT message EFT report based on the *Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations*. The mandatory information is shown by an asterisk (*).

For instructions about completing and sending these reports by batch, and for more information about the content of SWIFT tags, see the document called *SWIFT format EFT Transactions – Batch Reporting Instructions and Specification*.

PART A — Information about the transaction

1. Time of processing of the transaction (see Tag :13C: in the SWIFT message)
2. *Value date (see Tag :32A: in the SWIFT message)
3. *Amount of the EFT (see Tags :32A: and :33B: in the SWIFT message)
4. *Currency of the EFT (see Tags :32A: and :33B: in the SWIFT message)
5. Exchange rate (see Tag :36: in the SWIFT message)
6. Transaction type code (see Tag :26T: in the SWIFT message)

PART B — Information about the client ordering the EFT

1. *Client's full name (see Tag :50: in the SWIFT message)
2. *Client's full address (see Tag :50: in the SWIFT message)
3. *Client's account number, if applicable (see Tag :50: in the SWIFT message)

PART C — Information about the individual or entity sending the EFT

1. *Bank identification code (BIC) or full name and address of the individual or entity sending the payment instructions for the EFT (see Tag :51A: and the basic header in the SWIFT message as well as the FINTRAC header required for each batch report)

PART D — Information about the individual or entity ordering an EFT on behalf of a client (if applicable)

1. *Bank identification code (BIC) or full name and address of the ordering institution (if applicable) (see Tag :52: in the SWIFT message)

PART E — Information about the sender's correspondent (if applicable)

1. *Bank identification code (BIC) or full name and address of the individual or entity (other than the sender) acting as reimbursement bank for the sender of the EFT (if applicable) (see Tag :53: in the SWIFT message)

PART F — Information about the receiver's correspondent (if applicable)

1. *Bank identification code (BIC) or full name and address of the individual or entity acting as reimbursement bank for the receiver of the EFT (if applicable) (see Tag :54: in the SWIFT message)

PART G — Information about the third reimbursement institution (if applicable)

1. *Bank identification code (BIC) or full name and address of the EFT receiver's branch, if the funds are made available to the receiver's branch through a financial institution other than the sender's correspondent (if applicable) (see Tag :55: in the SWIFT message)

PART H — Information about the intermediary institution (if applicable)

1. *Bank identification code (BIC) or full name and address of the financial institution through which the transaction must pass (the financial institution between the receiver and the financial institution where the account is held) (if applicable) (see Tag :56: in the SWIFT message)

PART I — Information about the beneficiary customer account institution (if applicable)

1. *Bank identification code (BIC) or full name and address of the financial institution that services the account for the beneficiary customer (if this financial institution is not the receiver) (if applicable) (see Tag :57: in the SWIFT message)

PART J — Information about the individual or entity receiving the EFT

1. *Bank identification code (BIC) or full name and address of the individual or entity receiving the payment instructions (see the application header in the SWIFT message)

PART K — Information about the client to whose benefit payment is made

1. *Client's full name (see Tag :59: in the SWIFT message)
2. *Client's full address (see Tag :59: in the SWIFT message)
3. *Client's account number, if applicable (see Tag :59: in the SWIFT message)

PART L — Additional payment information

1. Remittance information (see Tag :70: in the SWIFT message)
2. Details of charges (see Tags :71A: and :71G: in the SWIFT message)
3. Sender's charges (see Tag :71F: in the SWIFT message)
4. Sender's reference (see Tag :20: in the SWIFT message)
5. Bank operation code (see Tag :23B: in the SWIFT message)
6. Instruction code (see Tag :23E: in the SWIFT message)
7. Sender-to-receiver information (see Tag :72: in the SWIFT message)
8. Regulatory reporting (see Tag :77B: in the SWIFT message)
9. Envelope contents (see Tag :77T: in the SWIFT message)

Note: If the 24-hour rule applies to a SWIFT EFT, and, because of this, information that is mandatory (as indicated above) was not obtained at the time of the transaction (and is not available from the SWIFT message or your records), you can leave the information out of your report to FINTRAC.

Appendix 1B: Contents of an Incoming SWIFT Message Report

This Appendix lists the requirements for an incoming SWIFT message EFT report based on the *Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations*. The mandatory information is shown by an asterisk (*).

For instructions about completing and sending these reports by batch, see the document called *SWIFT format EFT Transactions – Batch Reporting Instructions and Specification*.

PART A — Information about the transaction

1. Time of processing of the transaction (see Tag :13C: in the SWIFT message)
2. *Value date (see Tag :32A: in the SWIFT message)
3. *Amount of the EFT (see Tags :32A: and :33B: in the SWIFT message)
4. *Currency of the EFT (see Tags :32A: and :33B: in the SWIFT message)
5. Exchange rate (see Tag :36: in the SWIFT message)
6. Transaction type code (see Tag :26T: in the SWIFT message)

PART B — Information about the client ordering the EFT

1. Client's full name (see Tag :50: in the SWIFT message)
2. Client's full address (see Tag :50: in the SWIFT message)
3. Client's account number, if applicable (see Tag :50: in the SWIFT message)

PART C — Information about the individual or entity sending the EFT

1. Bank identification code (BIC) or full name and address of the individual or entity sending the payment instructions for the EFT (see Tag :51A: and the application header in the SWIFT message)

PART D — Information about the individual or entity ordering an EFT on behalf of a client (if applicable)

1. Bank identification code (BIC) or full name and address of the ordering institution (if applicable) (see Tag :52: in the SWIFT message)

PART E — Information about the sender's correspondent (if applicable)

1. Bank identification code (BIC) or full name and address of the individual or entity (other than the sender) acting as reimbursement bank for the sender of the EFT (if applicable) (see Tag :53: in the SWIFT message)

PART F — Information about the receiver's correspondent (if applicable)

1. *Bank identification code (BIC) or full name and address of the individual or entity acting as reimbursement bank for the receiver of the EFT (if applicable) (see Tag :54: in the SWIFT message)

PART G — Information about the third reimbursement institution (if applicable)

1. *Bank identification code (BIC) or full name and address of the EFT receiver's branch, if the funds are made available to the receiver's branch through a financial

institution other than the sender's correspondent (if applicable) (see Tag :55: in the SWIFT message)

PART H — Information about the intermediary institution (if applicable)

1. *Bank identification code (BIC) or full name and address of the financial institution through which the transaction must pass (the financial institution between the receiver and the financial institution where the account is held) (if applicable) (see Tag :56: in the SWIFT message)

PART I — Information about the beneficiary customer account institution (if applicable)

1. *Bank identification code (BIC) or full name and address of the financial institution that services the account for the beneficiary customer (if this financial institution is not the receiver) (if applicable) (see Tag :57: in the SWIFT message)

PART J — Information about the individual or entity receiving the EFT

1. *Bank identification code (BIC) or full name and address of the individual or entity receiving the payment instructions (see the basic header in the SWIFT message and the FINTRAC header required for each batch report)

PART K — Information about client to whose benefit payment is made

1. Client's full name (see Tag :59: in the SWIFT message)
2. Client's full address (see Tag :59: in the SWIFT message)
3. Client's account number, if applicable (see Tag :59: in the SWIFT message)

PART L — Additional payment information

1. Remittance information (see Tag :70: in the SWIFT message)
2. Details of charges (see Tags :71A: and :71G: in the SWIFT message)
3. Sender's charges (see Tag :71F: in the SWIFT message)
4. Sender's reference (see Tag :20: in the SWIFT message)
5. Bank operation code (see Tag :23B: in the SWIFT message)
6. Instruction code (see Tag :23E: in the SWIFT message)
7. Sender-to-receiver information (see Tag :72: in the SWIFT message)
8. Regulatory reporting (see Tag :77B: in the SWIFT message)
9. Envelope contents (see Tag :77T: in the SWIFT message)

Note: If the 24-hour rule applies to a SWIFT EFT, and, because of this, information that is mandatory (as indicated above) was not obtained at the time of the transaction (and is not available from the SWIFT message or your records), you can leave the information out of your report to FINTRAC.

Appendix 2: Scenarios for Outgoing SWIFT EFT Reports Involving Another Reporting Entity

It can happen that a client requests a financial entity, a money services business or a foreign exchange dealer to transfer funds outside of Canada, and, instead of sending the EFT themselves, they order you to send it. If you send it as a SWIFT message, you have to make a SWIFT related EFT report to FINTRAC.

The entity that orders you to send the EFT will also have to make a non-SWIFT EFT report (EFTO) to FINTRAC, **unless** they provide you with the client's name and address. The following example provides two different scenarios to explain how the required reports are to be completed in such cases.

EXAMPLE

A client requests a money services business to send an international electronic funds transfer (EFT) of \$12,000 from Canada. The money services business does not send the EFT itself, but orders a financial entity to do so. For the purposes of this example, the financial entity sends the EFT as a SWIFT member on the SWIFT network. Also for the purposes of this example, **neither** the client ordering the EFT from the money services business **nor** the beneficiary of the EFT is acting on behalf of a third party. Finally, for the purposes of this example, there is no correspondent, no reimbursement or intermediary institution, and no beneficiary customer account institution.

SCENARIO 1

The money services business provides the client's name and address to the financial entity. In this scenario, the money services business does **not** send an EFTO report to FINTRAC. Only the financial entity must send an outgoing SWIFT EFT report to FINTRAC, as follows:

- Part A is for general information about the transaction. This is provided in Tags:13C:, :32A:, :33B:, :36: and :26T: from the SWIFT message.
- In Part B, the financial entity has to provide FINTRAC with the information about the money services business' client, as provided by the money services business. This is provided in Tag :50: from the SWIFT message.
- Part C is for information about the financial entity, as the reporting entity (This is provided in Tag :51A: and the basic header from the SWIFT message as well as in the FINTRAC header required for each batch report.
- Part D applies to this report because the money services business is ordering the EFT on a client's behalf. The financial entity will provide information about the money services business, in Tag :52: from the SWIFT message.
- Parts E to I do not apply, as there are no correspondents, no reimbursement or intermediary institutions, and no beneficiary customer account institution.

- Part J is for information about the individual or entity outside Canada who will be receiving the EFT instructions. It is about the bank or other type of financial service provider who will receive the EFT instructions to provide payment to the beneficiary. This is provided in the application header from the SWIFT message.
- Part K is for information about the beneficiary to whose benefit the EFT is sent. This is provided in Tag :59: from the SWIFT message.
- Part L is for additional payment information provided in Tags :20:, :23B:, :23E:, :70:, :71A:, :71F:, :71G:, :72:, :77B:, and :77T: from the SWIFT message.

SCENARIO 2

The money services business does **not** provide the client’s name and address to the financial entity. In this scenario, the money services business and the financial entity must **both** report the EFT to FINTRAC. The money services business must send an outgoing **non-SWIFT** EFT report (EFTO), and the financial entity must send an outgoing **SWIFT** EFT report.

The following table shows the similarities and differences for the two reports.

Money services business’ EFTO report (non-SWIFT)	Financial entity’s outgoing SWIFT EFT report
General information about the transaction (Part A)	General information about the transaction (Tags :13C:, :32A:, :33B:, :36: and :26T)
The money services business has to provide FINTRAC with the client’s full name and full address, along with the rest of the information about their client (Part B)	The financial entity has to provide FINTRAC with information about the money services business, as the money services business is the client ordering the EFT from the financial entity in this context (Tag :50:).
Information about the money services business, as the reporting entity (Part C)	Information about the financial entity, as the reporting entity (Tag :51A: and the basic header in the SWIFT message as well as the FINTRAC header required for each batch report).
Information about ordering client’s third party (Part D) does not apply to this report because the money services business’ client is not ordering the EFT on anyone else’s behalf	Information about ordering client’s third party does not apply to this report because the money services business is not providing information about their client to the financial entity and the money services business is required to provide that information in their own report to FINTRAC.

Money services business' EFTO report (non-SWIFT)	Financial entity's outgoing SWIFT EFT report
Information about the individual or entity outside Canada who will be receiving the EFT instructions (Part E). This is not about the financial entity that is being ordered to send the EFT. It is about the bank or other type of financial service provider outside Canada who will receive the EFT instructions to provide payment to the beneficiary.	Information about the individual or entity outside Canada who will be receiving the EFT instructions. It is about the bank or other type of financial service provider outside Canada who will receive the EFT instructions to provide payment to the beneficiary (application header in the SWIFT message).
Information about the beneficiary to whose benefit the EFT is sent (Part F)	Information about the beneficiary to whose benefit the EFT is sent (Tag :59:).
Information about the beneficiary's third party does not apply to this report because the beneficiary is not acting on anyone else's behalf (Part G)	Information about the beneficiary's third party does not apply to this report.
	Other SWIFT tags may apply according to additional payment information in the SWIFT message for which there is no equivalent in a non-SWIFT report.

Note: For information about the contents of the financial entity's report if the EFT were sent as other than a SWIFT message, refer to the scenarios explained in *Guideline 8A: Submitting non-SWIFT Electronic Funds Transfer Reports to FINTRAC Electronically*.