In the context of the implementation of Regulation (EU) No 910/2014 of the
European Parliament and of the Council of 23 July 2014 on electronic
identification and trust services for electronic transactions in the internal
market electronic identification and trust services for electronic transactions
in the internal market and specifically of the Commission's
CEF programme of the Commission, with an emphasis on the CEF eSignature which
aims to help public administrations and businesses to create and verify
electronic signatures in the
companies to create and verify electronic signatures in accordance with the
eIDAS Regulation. In this context, the following consultation arises
concerning the electronic signature of transfer issues in the Castelló de la
Plana City Council.

The payments ordered by the Castelló de la Plana City Council are included in
transfer issues, which are made by
sending by electronic banking of a file in accordance with regulation 34.
The transfer orders, as they involve an outflow of funds from the municipal
accounts, must be authorised by three signatures: Mayor,
Auditor and Treasurer, as stipulated in the regulations.

Before the implementation of e-administration, signed paper orders were
physically presented to the financial institution that had to execute them and
the bank that had to execute them.
and the bank would collate the three signatures to execute the transfer orders.

Nowadays, the financial institution's electronic banking system is accessed and
there is no possibility of sending the transfer files to the banks by electronic
signature.
electronic signature; instead, each financial institution has a signature system
for sending files, with tokens, with
coordinate cards, and recently, we have been asked to use a code sent to a
mobile phone.

In compliance with the provisions of:
1¼) Law 39/2015, of 1 October, on the Common Administrative Procedure of Public
Administrations.
2) Law 59/2003, of 19 December, on electronic signatures.
3) Royal Decree-Law 19/2018, of 23 November, on payment services and other
urgent measures in financial matters, which
specifically establishes the following:
4. Authentication: procedure enabling the payment service provider to verify the
identity of a payment service user or the validity of the use of a given payment
instrument.
the validity of the use of a given payment instrument, including the use of
personalised security credentials of the user.
user's personalised security credentials.
5. Strong customer authentication: authentication based on the use of two or
more elements categorised as knowledge (something known only to the user).
(something known only to the user), possession (something possessed only by the
user) and inherence (something that is the user), which are independent - i.e.,
that a breach of the user's credentials is not possible without the user's
knowledge.
i.e. a breach of one does not compromise the trustworthiness of the others - and
designed in a way that protects the confidentiality of
identification data.

4) The Commission Delegated Regulation (EU) 2018/389 of 27 November 2017
supplementing Directive (EU)
2015/2366 of the European Parliament and of the Council as regards regulatory
technical standards for strong customer authentication and common open
communication standards.
and common and secure open communication standards.

In view of the above, the following query is raised:

How should one proceed given that the legally established form for the signature of credit transfer issues by the three
authorised in financial institutions is the electronic signature, and financial institutions do not have this form of signature for authenticating transactions. How should the transfer issue file be sent and signed?