



Electronic Money Association

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FIAU

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CBD 2010

31 July 2026

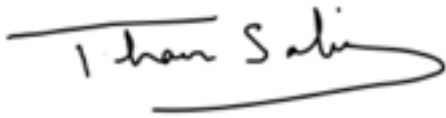
Dear Sir/Madam,

RE: EMA response to the FIAU Consultation on Proposed Legislative Changes to Transpose and Implement the Legislative Instruments within the AML Package

The EMA is the EU trade body representing electronic money issuers and alternative payment service providers. Our members include leading payments and e-commerce businesses worldwide, providing online payments, card-based products, electronic vouchers, and mobile payment instruments. Most members operate across the EU, including Malta and most frequently on a cross-border basis. A list of current EMA members is provided at the end of this document.

The EMA welcomes the opportunity to respond to the FIAU consultation on proposed legislative changes to transpose and implement the legislative instruments within the EU AML Package. EMA members support the objective of ensuring a smooth and effective implementation of the new EU AML/CFT framework in Malta. EMA's comments focus primarily on ensuring clarity, avoiding duplicative notification requirements, and supporting proportionate implementation for payment service providers.

Yours sincerely



Dr Thaer Sabri
Chief Executive Officer
Electronic Money Association

Amendments to the Prevention of Money Laundering Act (PMLA)

1. Article 7 – Notifications to the FIAU

Article 7 provides that the FIAU will receive a number of notifications, including notifications relating to cross-border operations, removal of the compliance officer, outsourcing arrangements and partnerships for information sharing.

EMA would welcome clarification on how these notification requirements will be aligned in practice with the centralised reporting mechanism being developed by the MFSA and FIAU.

Several of the matters listed in Article 7 may also be relevant to prudential, conduct or operational supervision by the MFSA, particularly for licensed payment and electronic money institutions. It would therefore be helpful to clarify whether obliged entities will be expected to submit separate notifications to the FIAU and to the MFSA.

2. Article 10(2) – Central contact point supervision

EMA would welcome clarification on the operation of Article 10(2), in particular where the FIAU considers that the criteria for the appointment of a central contact point are not met and notifies the supervisor of the Member State where the head office of the obliged entity is located.

In particular, EMA would be grateful if the FIAU could clarify whether its determination that the criteria for the appointment of a central contact point are not met will also take into account the “limited infrastructure” assessment referred to in Article 38(2)(b) of Directive (EU) 2024/1640.

This is relevant for payment and electronic money institutions operating on a cross-border basis, where the practical assessment of local infrastructure, local activity and the appropriate supervisory arrangements may differ depending on the business model and the nature of the services provided in Malta.

3. Article 12 – Entities that are part of a group

Article 12 refers to obliged entities that have their “registered office or head office located in Malta” and provides that the FIAU shall supervise the effective implementation of group-wide policies, procedures and controls referred to in Chapter II, Section 2 of Regulation (EU) 2024/1624.

EMA would welcome confirmation that this provision is intended to capture the parent undertaking or head office responsible for group-wide AML/CFT compliance, rather than any Maltese entity that forms part of a wider group.

This clarification would be helpful for international groups, where a Maltese entity may be part of a wider EU or third-country group but may not itself be responsible for setting or maintaining group-wide policies, procedures and controls.

Article 12(5) appears to contain a minor numbering issue, as the list of information to be exchanged repeats points (a) and (b).



Members of the EMA as of July 2026

Airbnb Inc	MuchBetter
Aircash	myPOS Payments Ltd
Airwallex (UK) Limited	Navro Group Limited
Amazon	Newrails, UAB
American Express	Nium Solutions Limited
Banked	Nuvei Financial Services Ltd
BCB Digital Ltd	OFX
Bitstamp	OKX
Blackhawk Network EMEA Limited	OpenPayd
Boku Inc	Owl Payments Europe Limited
Booking Holdings Financial Services International Limited	Own.Solutions
BVNL	Papaya Global / Azimo
Bytedance Payments	Park Card Services Limited
Cardaq Ltd	pay.cetera B.V.
CashFlows	Payhawk Financial Services Limited
Circle	Paymentsense Limited
Coinbase	Payoneer Europe Limited
Crypto.com	PayPal
Currenxie Technologies Limited	Paysafe Group
Decta Limited	Paysend EU DAC
Deel	Peratera UK Ltd
eBay Sarl	Plaid B.V.
ECOMMPAY Limited	Pleo Financial Services A/S
emerchantpay Group Ltd	PPS
EML Payments	Push Labs Limited
EPG Financial Services Limited	Remitly
eToro Money	Revolut
Etsy Ireland UC	Ripple
Euronet Worldwide Inc	Satispay Europe S.A.
Finance Incorporated Limited	Securiclick Limited
Financial House Limited	Segpay
FinXP	Soldo Financial Services Ireland DAC
First Rate Exchange Services	Square
Fiserv	Stripe
Flywire	SumUp Limited
Globepay Limited	Syspay Ltd
GoCardless Ltd	TransactPay
Google Payment Ltd	TransferGo Ltd
IDT Financial Services Limited	TransferMate Global Payments
iFAST Global Bank Limited	TrueLayer Limited
Imagor SA	Uber BV
	Unzer Luxembourg SA



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MONETLEY LTD
Moneyhub Financial Technology Ltd
Moorwand Ltd

Vitesse PSP Ltd
VIVA WALLET.COM LTD
Weavr Limited
WEX Europe UK Limited
Wise
WorldFirst