Contribution ID: 7560c99a-5a63-4f53-982d-7282841ddd9a
Date: 18/09/2026 17:11:00

Consultation on the draft ITS pursuant to Art. 69 (3) AMLR on the format to be used for the reporting of suspicions and for the provision of transaction records

Fields marked with * are mandatory.

Objective of the consultation

AMLA would like to receive feedback on provisions of the draft ITS under Article 69(3) of Regulation (EU) 2024/1624 ('AMLR') and in particular on the specific questions set out below.

Comments are most helpful if they:

- respond to the question stated;
- - indicate the specific point to which a comment relates;
- - contain a clear rationale;
- - provide evidence to support the views expressed/ rationale proposed; and
- - describe any alternative regulatory choices AMLA should consider.

Such comments should be sent by **20 September 2026, 23:59 (CET).**

Personal data protection:

The protection of individuals with regard to the processing of personal data by the AMLA is based on Regulation (EU) 2018/1725. Further information on the processing of the personal data is available in the Data Protection Notice.

All legal details can be found in our Specific Privacy Statement (SPS).

How to provide feedback

All the fields marked with an asterisk (*) are mandatory. If a question is not relevant for you, please answer with "NA".

We are using a survey format to help us analyse feedback effectively and efficiently. For this reason, document uploads are not enabled for this exercise, and we kindly invite you to share your comments directly within the survey.

Please note that by submitting your contribution, you acknowledge that it will be published on AMLA's website. Contributions will always be published. The name of organisations submitting their contribution will also always be published. The name of the natural person providing a contribution will be published unless they object to said publication. Please refrain from inserting further personal information beyond what we ask from you. In particular, please refrain from providing confidential information or special categories of personal data (that is "personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"). Your email address will never be published.

Before publication, AMLA staff will perform a limited screening of all contributions provided for the sole purpose of filtering any inappropriate submissions. After this, the replies are made available to the public directly on AMLA's public consultations page.

Please note that your contribution may be subject to a request for access to documents under Regulation 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Language disclaimer

AMLA welcomes submissions in all official EU languages. You can change the displayed language of this public consultation using the language selector in the top right corner of the EU Survey platform. Please note that all language versions other than English have been produced using machine translation and may contain inaccuracies. When in doubt, please refer to the English version. Should you encounter issues with submitting your responses, please contact us by email at public.consultations@amla.europa.eu no later than 48 hours before the deadline of the consultation period.

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* This contribution is made by:

- (•) An organisation
- ( ) An individual

* Name of the organisation

200 character(s) maximum

Electronic Money Association (EMA)

* First name of individual (individual respondent or representative of organisation)

100 character(s) maximum

Judith

* Surname of individual (individual respondent or representative of organisation)

100 character(s) maximum

Crawford

* Email (note that your email address will not be published)

100 character(s) maximum

judith.crawford@e-ma.org

* Publication of your name and surname

- [ ] I agree to the publication of my name and surname (note that your email address will never be published)
- [x] Contribution to be published without my name and surname (note that your email address will never be published)

* Select to which member state(s) your response refers:

Minimum 1 selection(s)

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- Other (please specify)

* Select the country in which you or your organisation carry out your main activities:

Minimum 1 selection(s)

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- Other (please specify)

* Which of the following best describes your organisation?

- ○ Obliged entity (OE) (in the sense of Regulation (EU) 2024/1624 Art. 3 Regulation - EU - 2024/1624 - EN - EUR-Lex)
- ○ Competent Authority (in the sense of Regulation (EU) 2024/1624 Art. 2 (1) (44) Regulation - EU - 2024/1624 - EN - EUR-Lex)
- ○ Self-Regulatory Body (in the sense of Regulation (EU) 2024/1624 Art. 2 (1) (47) Regulation - EU - 2024/1624 - EN - EUR-Lex)
- ◉ Industry Association
- ○ Civil Society Organisation / NGO
- ○ Other (please specify)

In which sector(s) do you primarily operate or engage with?

* ☑ Financial Sector
☐ Non-Financial Sector
☐ Other (please specify)

* Financial Sector

- ☐ Credit institution or branch
- ☑ Undertaking other than a credit institution or an investment firm, which carries out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I to Directive 2013/36/EU of the European Parliament and of the Council (32)
- ☐ Insurance undertaking or intermediary
- ☐ Investment firm or collective investment undertaking
- ☐ Central securities depository
- ☐ Creditor
- ☐ Credit Intermediary
- ☑ Crypto-asset service provider

Compared to the current suspicion reporting process, what would be the expected level of monetary one-off investment costs for your institution (e.g. IT system changes, staff training, internal policy/procedure updates, etc.), based on the details provided in the draft ITS:

- ○ Nontangible one-off costs
- ○ Limited
- ○ Manageable
- ● Disruptive (please provide further details and evidence)

* Justification of assessment as Disruptive

The EMA expects the proposed framework to result in significant one-off implementation costs for payment and electronic money institutions.

Information required for suspicion reporting is often held across multiple systems, including transaction monitoring, customer screening, KYC/onboarding and case-management systems. Moving to a structured, machine-readable reporting format may therefore require significant work to identify, map and extract relevant data across those systems, as well as changes to existing reporting processes and technology.

Implementation costs may be particularly significant for firms with reporting volumes that make manual reporting inefficient, but which are not sufficiently high to justify investment in a fully automated reporting solution.

As AMLA recognises in the consultation, country-specific additions would require cross-border firms to maintain jurisdiction-specific reporting structures and procedures. Costs may therefore be higher for firms operating across multiple Member States where national FIUs require additional specific data fields or technical requirements.

In your view, how would the implementation of a new format for reporting suspicions affect your institution's ongoing (recurrent) suspicion reporting process costs (excluding one-off investments)?

- (x) Increase
- ( ) Decrease
- ( ) No impact

If you expect increase or decrease, please estimate the percentage change in ongoing costs compared to the current situation.

- ( ) <5
- ( ) 6-10
- ( ) 11-20
- ( ) 21-30
- ( ) 31-50
- ( ) 51-75
- ( ) 76-100
- (x) >100 (increase only)

What are the main drivers of the expected change in costs?

- [x] Changes in reporting format complexity
- [x] Degree of harmonisation across jurisdictions
- [x] IT system adaptation requirements
- [x] Staff training and procedural changes
- [x] Volume of required data fields
- [ ] Automation opportunities
- [x] Other (please specify)

*Specification of Other

The impact on ongoing costs will largely depend on the degree of harmonisation achieved in practice. A harmonised EU reporting framework should reduce the cost and complexity of maintaining different reporting processes across Member States. However, those benefits may be limited if national FIUs continue to impose additional data fields or technical requirements.

Firms could otherwise find themselves maintaining jurisdiction-specific reporting processes alongside the new harmonised framework, increasing rather than reducing ongoing compliance costs.

The EMA therefore recommends that AMLA reconsider the degree of flexibility afforded to national FIUs to introduce additional requirements. Any national additions should be strictly limited to circumstances where they are genuinely necessary and should not undermine the objective of establishing a harmonised EU reporting framework. Allowing greater national variation would risk reproducing the fragmentation that the ITS is intended to remove and would materially reduce the expected efficiency and cost benefits for cross-border firms. Where any divergence is proposed, FIUs should be required to provide AMLA with a clear, evidence-based justification and rationale for that divergence.

What would be the timeframe needed for you to adapt to the new framework?

- ( ) Less than 1 year
- ( ) 1 to 2 years
- (•) 2 to 3 years
- ( ) More than 3 years

While the exact timeframe needed for technical implementation and full application of the ITS is not determined yet, it is envisaged to provide five years (three for FIUs and two for obliged entities integrating the reporting schemes into their internal systems, with a possible overlap). Is this timeframe:

- ( ) Adapted to the respective needs of FIUs and obliged entities
- (•) Too short (please provide explanation)
- ( ) Too long (please provide explanation)

* Explanation

> The EMA considers the implementation timeline envisaged by the ITS to be appropriate in principle. AMLA currently envisages a five-year process, comprising three years for FIUs and two years for obliged entities to integrate the reporting requirements into their internal systems, with a possible overlap.
>
> Given the potentially significant system changes required, it is important that obliged entities have the benefit of the full two-year implementation period once the final reporting requirements and relevant technical specifications are sufficiently settled. If those requirements are finalised only after the implementation period has begun, firms may in practice have materially less time to implement and test the necessary changes.

How would you rate the proposed approach, in particular Articles 3 and 4 of the draft ITS, regarding the necessary balance between harmonisation, quality and efficiency of reporting?

- ( ) Fully agree
- (•) Agree to some extent (please provide explanation)
- ( ) Disagree to some extent (please provide explanation)
- ( ) Fully disagree (please provide explanation)

* Explanation:

> The EMA supports the objective of harmonising suspicion reporting across the EU. A common reporting framework should reduce complexity for firms operating across multiple Member States and improve consistency in reporting.
>
> The benefits of harmonisation will, however, depend on the degree of national variation that remains. If firms are required to implement the harmonised framework while continuing to accommodate separate national reporting requirements, this would significantly reduce the efficiencies the ITS is intended to achieve.
>
> The EMA would therefore welcome significant limitations on the extent to which national FIUs may impose additional data fields or technical requirements alongside the harmonised framework, and that they should be obligated to provide AMLA with an evidence-based justification and rationale for any divergences.

Do you agree with the grouping of obliged entities for the purpose of different templates for the reports of suspicion and for the transaction records?

- [x] Yes
- [ ] No (please provide explanation)

Does the ITS need further clarification on definitions, processes or legal aspects?

- [x] Yes (please provide explanation)
- [ ] No

* Explanation

Yes. In particular, the EMA would welcome clarification regarding data points designated as “mandatory if available”.

Article 3(5)(b) provides that such data points must be provided where the relevant information is available to the obliged entity at the time of reporting. The EMA considers that it should be expressly confirmed that this classification does not require an obliged entity to collect or obtain information that it is not otherwise required to collect or obtain under the AMLR solely for the purpose of completing the reporting format.

“Mandatory if available” should therefore mean information already available to the obliged entity at the time of reporting and should not indirectly extend the firm's underlying information-collection obligations. It should read “mandatory if available to the Obliged Entity at the time of reporting.”

Several data points will be country-specific and not required by all FIUs, depending on their national legal frameworks.

How would you rate the addition of country-specific data points?

- [ ] The country-specific data points are acceptable
- [ ] The country-specific data points have no impact
- [x] The country-specific data points pose challenges (please provide explanation)

* Explanation

The EMA recognises that some country-specific data points may be necessary to reflect national legal requirements or particular FIU needs. However, extensive use of such data points could significantly reduce the benefits of EU-level harmonisation.

For firms operating across multiple Member States, a key benefit of the harmonised framework should be the ability to develop common reporting processes and systems. If significant national additions remain, firms may still need to build and maintain different reporting arrangements across jurisdictions.

The EMA would therefore support limiting country-specific data points to those genuinely necessary under national law or for specific FIU requirements, so that the benefits of harmonisation are not undermined. FIUs should also be obligated to provide AMLA with an evidence-based justification and rationale for any divergences.

AMLA developed templates adapted to various types of obliged entities (see Annexes I and II of the Draft ITS and Interpretative Note).

How would you rate the established list of data points for the various sector categories, as established in Annexes I and II, in terms of comprehensiveness and clarity?

	Please select the list you wish to comment on	Please rate the list in terms of comprehensiveness; are all required data points included? The list is:	Please rate the list in terms of clarity; are the data points defined clearly without ambiguity? The list is:	Provide comments if you choose major adjustments needed in either category
1	Annex 1 - Financial institution and credit institutions Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions Annex 1 - Crowdfunding service providers and intermediaries Annex 1 - Notaries Annex 1 - Real estate agents Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods Annex 1 - Providers of gambling services Annex 1 - Football agents and professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs	fully comprehensive sufficiently comprehensive minor adjustments needed major adjustments needed	fully clear sufficiently clear minor adjustments needed major adjustments needed	

2	Annex 1 - Financial institution and credit institutions ◯ Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ◯ Annex 1 - Crowdfunding service providers and intermediaries ◯ Annex 1 - Notaries ◯ Annex 1 - Real estate agents ◯ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ◯ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ◯ Annex 1 - Providers of gambling services ◯ Annex 1 - Football agents and professional football clubs ◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs	◯ fully comprehensive ◯ sufficiently comprehensive ◯ minor adjustments needed ◯ major adjustments needed	◯ fully clear ◯ sufficiently clear ◯ minor adjustments needed ◯ major adjustments needed	
	◯ Annex 1 - Financial institution and credit institutions ◯ Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions			

3	Annex 1 - Crowdfunding service providers and intermediaries Annex 1 - Notaries Annex 1 - Real estate agents Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods Annex 1 - Providers of gambling services Annex 1 - Football agents and professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs	fully comprehensive sufficiently comprehensive minor adjustments needed major adjustments needed	fully clear sufficiently clear minor adjustments needed major adjustments needed	
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4	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods Annex 1 - Providers of gambling services Annex 1 - Football agents and professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs	fully comprehensive sufficiently comprehensive minor adjustments needed major adjustments needed	fully clear sufficiently clear minor adjustments needed major adjustments needed	
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	Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ◯ Annex 1 - Providers of gambling services ◯ Annex 1 - Football agents and professional football clubs ◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs			

Please comment on the individual data points of your selection.

Select the data point on which you would like to comment, then select which aspect of the data point you would like to comment (name, definition, treatment, attributes, etc.), and provide the content of your comment.

Note: you can submit comments on up to 20 questions in one questionnaire. Should you wish to comment on more than the indicated number, please submit another questionnaire again.

	Datapoints list version your comment pertains to	Ref. No. of the datapoint you would like to comment on: To ensure the processing of your comment, please provide the full reference number: "DPXXXX"	Particular field of the selected datapoint the comment pertains to:	The body of the comment
1	◯ Annex 1 - Financial institution and credit institutions ◯ Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ◯ Annex 1 - Crowdfunding service providers and intermediaries ◯ Annex 1 - Notaries ◯ Annex 1 - Real estate agents ◯ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ◯ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ◯ Annex 1 - Providers of gambling services ◯ Annex 1 - Football agents and professional football clubs ◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs		◯ Category ◯ Sub-category ◯ Name of the datapoint ◯ Definition ◯ Treatment ◯ Dependency	
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2	◯ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ◯ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ◯ Annex 1 - Providers of gambling services ◯ Annex 1 - Football agents and professional football clubs ◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs		◯ Sub-category ◯ Name of the datapoint ◯ Definition ◯ Treatment ◯ Dependency	
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4	Annex 1 - Real estate agents Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods Annex 1 - Providers of gambling services Annex 1 - Football agents and professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs		Category Sub-category Name of the datapoint Definition Treatment Dependency	
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6	Annex 1 - Notaries Annex 1 - Real estate agents Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods Annex 1 - Providers of gambling services Annex 1 - Football agents and professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs		Category Sub-category Name of the datapoint Definition Treatment Dependency	
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8	◯ Annex 1 - Crowdfunding service providers and intermediaries ◯ Annex 1 - Notaries ◯ Annex 1 - Real estate agents ◯ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ◯ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ◯ Annex 1 - Providers of gambling services ◯ Annex 1 - Football agents and professional football clubs ◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs		◯ Category ◯ Sub-category ◯ Name of the datapoint ◯ Definition ◯ Treatment ◯ Dependency	
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	◯ Annex 1 - Financial institution and credit institutions ◯			

10	Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ◯ Annex 1 - Crowdfunding service providers and intermediaries ◯ Annex 1 - Notaries ◯ Annex 1 - Real estate agents ◯ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ◯ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ◯ Annex 1 - Providers of gambling services ◯ Annex 1 - Football agents and professional football clubs ◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs		◯ Category ◯ Sub-category ◯ Name of the datapoint ◯ Definition ◯ Treatment ◯ Dependency	
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16	◯ Annex 1 - Financial institution and credit institutions ◯ Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ◯ Annex 1 - Crowdfunding service providers and intermediaries ◯ Annex 1 - Notaries ◯ Annex 1 - Real estate agents ◯ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ◯ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ◯ Annex 1 - Providers of gambling services ◯ Annex 1 - Football agents and professional football clubs ◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs		◯ Category ◯ Sub-category ◯ Name of the datapoint ◯ Definition ◯ Treatment ◯ Dependency	
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	Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs			
18	Annex 1 - Financial institution and credit institutions Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions Annex 1 - Crowdfunding service providers and intermediaries Annex 1 - Notaries Annex 1 - Real estate agents Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods Annex 1 - Providers of gambling services Annex 1 - Football agents and professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs		Category Sub-category Name of the datapoint Definition Treatment Dependency	
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	◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs			
20	◯ Annex 1 - Financial institution and credit institutions ◯ Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ◯ Annex 1 - Crowdfunding service providers and intermediaries ◯ Annex 1 - Notaries ◯ Annex 1 - Real estate agents ◯ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ◯ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ◯ Annex 1 - Providers of gambling services ◯ Annex 1 - Football agents and professional football clubs ◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs		◯ Category ◯ Sub-category ◯ Name of the datapoint ◯ Definition ◯ Treatment ◯ Dependency	

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