



Public Consultation on the draft Regulatory Technical Standards on Customer Due Diligence under Article 28(1) of Regulation (EU) 2024/1624

Fields marked with * are mandatory.

Public Consultation on the draft RTS on Customer Due Diligence under Article 28(1) AMLR

Objective of the consultation

AML A would like to receive feedback on provisions of the draft RTS under Article 28(1) 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 AML A should consider.

Such comments should be sent by **8 May 2026, 23:59 (CET)**.

Personal data protection:

The protection of individuals with regard to the processing of personal data by the AML A 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.

Section 1 - Respondent profile

* This contribution is made by:

An organisation

* Name of the organisation

200 character(s) maximum

Spelbranschens Riksorganisation

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

100 character(s) maximum

Eva

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

100 character(s) maximum

Sjöberg

* Email (note that your email address will not be published)

100 character(s) maximum

eva.sjoberg@sper.se

* 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).
- Contribution to be published without my name and surname (note that your email address will never be published).

* Which of the following best describes your activity or organisation? Obligated entities are those listed in Article 3 of [Regulation \(EU\) 2024/1624](#).

Maximum 1 selection(s)

- Obligated entity in the non-financial sector
- Obligated entity in the financial sector
- Self-regulatory body in the sense of Regulation (EU) 2024/1624 Article 2(1) point (47)
- Industry association representing non-financial sector obliged entities
- Industry association representing financial sector obliged entities
- Civil society organisation/non-governmental organisation
- Other

* Non-financial sector

Maximum 14 selection(s)

- Auditors, external accountants, tax advisors, other independent professionals that provide assistance or advice on tax matters
- Notaries, lawyers, other independent legal professionals
- Trust or company service providers
- Estate agents, other real estate professionals
- Traders in precious metals and stones

- Traders in high-value goods
- Gambling service providers
- Crowdfunding service providers and crowdfunding intermediaries
- Traders or intermediaries in the trade or storage of cultural goods
- Credit intermediaries for mortgage and consumer credits (other than credit and financial institutions)
- Investment migration operators
- Non-financial mixed activity holding companies
- Football agents
- Football clubs

* Please select the country from which you or your organisation carry out your main activities:

SE - Sweden

Section 2 - Substantive comments on the draft Regulatory Technical Standards

* 1. Do you agree that the proposals set out in these draft RTS can be applied across the range of products and services provided by your obliged entity?

If you do not agree, please:

- (i) explain why the current proposals do not provide sufficient flexibility; and
- (ii) provide concrete drafting proposals and explain why the specific measures you propose would be more appropriate.

Provisions that are clearly marked as applying only to a specific sector or service should not be taken into consideration if they do not impact your sector.

5000 character(s) maximum

Member 1:

The RTS does not provide sufficient flexibility for the diversity of gambling products and services. Key issues include: One-off, low-value transactions are treated the same as ongoing financial relationships; Remote vs. in-person services require different verification methods; Product risk profiles vary significantly (e.g. online betting vs. land-based casinos vs. lotteries); Some provisions (e.g. Article 16 on representation) are not applicable to gambling contexts. What we propose:

- ✓ Threshold-based CDD triggers for low-value transactions.
- ✓ Explicit allowance for different verification methods based on service channel.
- ✓ Sector-specific guidance or recitals acknowledging gambling sector characteristics.
- ✓ Proportionality in applying automated tools and ongoing monitoring.

Member 2:

The RTS should reflect proportionality under Article 1 by explicitly allowing obliged entities to take into account existing controls, including prior customer identification, full transaction traceability and ongoing monitoring

capabilities.

Member 3:

Furthermore, the draft RTS would benefit from additional flexibility as regards the verification of supplementary identity attributes, in particular nationality and place of birth.

Rationale

While all relevant identity attributes should be collected, the draft RTS should clarify more expressly that separate verification of those attributes is not required automatically in all cases where the customer's core identity has already been verified in accordance with Article 22(6) of Regulation (EU) 2024/1624. Instead, the need for separate verification should be determined on a risk-sensitive basis.

AMLA should clarify in the RTS that, while all identity attributes must be collected, separate verification of nationality and place of birth should not be required automatically solely because those attributes are not evidenced on the primary identity document, where the customer's primary identity attributes have already been verified in accordance with Article 22(6) of Regulation (EU) 2024/1624. Instead, the need for separate verification of those supplementary attributes should be determined on a risk-sensitive basis. This would better reflect the AMLR and the draft RTS, which require customer due diligence measures to be proportionate in scope, intensity and frequency to the ML/TF risk associated with the customer, the business relationship or the occasional transaction.

The draft RTS already recognizes that not all government-issued identity documents contain information on nationality or place of birth and that such information may therefore need to be obtained from other sources. It also states that, where a person holds multiple nationalities and declares them in good faith, verifying one nationality is sufficient. This supports the principle that not every identity attribute must always be subject to the same degree of verification, provided that the customer's core identity has been reliably established.

For many obliged entities, particularly in the non-financial sector, a requirement to separately verify nationality and place of birth in all cases may be disproportionate and operationally burdensome, without generating a commensurate AML/CFT benefit. The legal environment in which the obliged entity operates should also be considered. For example, Swedish gambling operators may only provide gambling services to customers with permanent residency in Sweden. In some Member States, including Sweden, such information is often not available through ordinary national identity documentation and may require the customer to provide a passport or an official population register extract. Where the obliged entity has already verified the customer's identity and has no reason to doubt the plausibility or consistency of nationality or place of birth as declared by the customer, automatic separate verification should not be required.

AMLA should consider adding a short provision in Section 2 to clarify how missing identity attributes should be treated where the identity of a natural person has already been verified in accordance with Article 22(6) of Regulation (EU) 2024/1624. Please see section 3 for drafting proposal on new article.

* 2. Do you agree that the proposals set out in these draft RTS allow for the effective application of a risk-based approach towards compliance with AML/CFT requirements?

If you do not agree, please:

(i) specify the provisions concerned; and

(ii) provide concrete drafting proposals and explain why the specific measures you propose would be more appropriate.

Member 1:

While the RTS references the risk-based approach, several provisions are overly prescriptive and limit flexibility. For example:

- Art. 5 mandates collection of all nationalities
- Art. 7 requires high-assurance eID for remote onboarding
- Art. 19(3) implies automated PEP screening is mandatory
- Art. 18 & 24 require detailed purpose-of-relationship information even when purpose is obvious
- Art 30, as irrelevant screening customers at onboarding/prior a business relationship (a 2K EUR deposit has been made) as commented and indicated in the other RTS draft doc

We recommend revising these provisions to:

- Allow simplified measures for low-risk scenarios
- Permit alternative verification methods where eID is unavailable
- Enable manual PEP screening for small operators
- Accept generalised purpose statements for gambling services

Member 2:

In addition, the risk-based approach and its effectiveness depends on consistent application of 'where necessary', ensuring that flexibility is preserved and not replaced by implicit expectations of routine data collection.

Member 3:

Furthermore, the draft RTS supports a risk-based approach in principle, but overall, the RTS does not yet provide sufficient operational clarity to ensure that this approach can function effectively in practice.

Rationale

For well-defined and non-complex regulated products or services, the purpose and intended nature of the relationship can often be understood primarily from the characteristics of the product or service, the distribution channel and the legal or regulatory framework within which it is offered. This is particularly the case within the gambling and betting sector where it is seldom likely that the customer has a clear idea when it comes to the purpose and nature of the relationship when setting up a gambling or betting account. It is instead the actual behavior and pattern which provides ground for ongoing due diligence and business relationship monitoring against the entity's business risk assessment. In such cases, requiring additional information from each customer as a matter of course would often introduce operational friction without materially improving AML/CFT outcomes. A more explicit rule allowing obliged entities to determine, and where appropriate presume, those elements in such cases would therefore strengthen the risk-based approach rather than dilute it. Please see section 3 for drafting proposal (article 18 amended).

- *3. Considering the nature of your business, including its size, risks, and complexity, are there any situations where the information to be collected for the purposes of customer due diligence as proposed in these draft RTS is routinely unavailable and the proposals in these draft RTS do not provide an alternative solution? If so, please provide concrete examples of such situations and your proposals for alternative solutions.

Member 1:

There are situations where alternative solutions is needed. Examples include:

- Online customers in jurisdictions without eID infrastructure
- Low-value transactions where source of funds information is not feasible to collect

Member 2:

The key issue is not availability of information but its relevance. For example, requiring source-of-funds information for low-value gambling transactions is unlikely to provide meaningful AML value and may dilute focus from higher-risk scenarios. CDD requirements should therefore be strictly risk-driven and not applied routinely where risk is demonstrably low.

We propose:

- Allowing delayed or simplified verification for low-risk, low-value transactions
- Accepting alternative verification methods (e.g. bank account ownership, credit bureau checks)
- Permitting reliance on regulated payment providers' KYC for source of funds

Member 3:

Furthermore, see comments to question 2. The issue lies in the verification of the information collected.

- * 4. Considering AMLA's legal mandate in Article 28(1) of Regulation (EU) 2024/1624, and taking into account your obliged entities' products offered and service provided, what other simplified due diligence measures should be included in the draft RTS, for example because of the associated lower ML/TF risks of these products and services? Please provide concrete drafting proposals and rationale for the specific measures you would propose.

5000 character(s) maximum

Member 3:

The main difficulty in identifying additional simplified due diligence measures is that Section 5 is currently too weakly developed and insufficiently detailed to make such proposals with a sufficient degree of precision.

Rationale

The consultation paper explains that AMLA considered whether additional simplified due diligence measures should be specified beyond those already listed in Article 33 AMLR, but concluded that, at this stage, it had not identified opportunities to do so without creating exemptions from the AMLR. At the same time, the consultation paper states that Article 33 AMLR is already sufficiently flexible to enable a range of simplified measures in low-risk scenarios. That combination leaves Section 5 relatively abstract and makes it difficult to determine which further measures would most usefully be added to the RTS.

This difficulty is enhanced by the fact that, more generally, there is still limited concrete guidance at EU or national level on how simplified due diligence is expected to operate in practice. In the absence of more developed examples or clearer operational parameters in Section 5 itself, it is not easy to identify with confidence which additional measures are missing and how they should be framed.

Where the identity of a natural person has already been verified in accordance with Article 22(6) of Regulation (EU) 2024/1624, separate verification of supplementary identity attributes, including nationality and place of birth, should only be required where this is relevant and proportionate in light of the customer's risk profile, or necessary to ensure compliance with obligations relating to politically exposed persons, targeted financial sanctions, or other applicable legal or supervisory requirements. This would be consistent with the consultation paper's repeated emphasis on proportionality, flexibility and the need for the RTS to work across both financial and non-financial obliged entities. It would also respond to the same practical concern identified elsewhere in the draft, including in relation to Article 24, namely that lower-risk measures need to be operationally workable for well-defined and regulated service models.

In particular, it would be helpful to state that, in low-risk situations involving standardized, well defined and regulated products or services, simplified due diligence may take account of the characteristics of the relevant sector, the product or service, the onboarding framework, the distribution model and the applicable regulatory environment, provided that sufficient monitoring remains in place. This would not create an exemption from customer due diligence but would give more practical content to the concept of reduced scrutiny in genuinely lower-risk, regulated settings. Please see section 3 for drafting proposal on new article in section 5.

Member 2:

In addition, electronic identification schemes aligned with eIDAS should be explicitly recognised. National solutions such as Swedish BankID should be accepted where they meet 'substantial' or 'high' assurance levels, supporting both harmonisation and operational efficiency.

- * 5. Additional observations: Do you have any additional comments relevant to the draft RTS that have not been covered above? Please ensure that comments refer to a specific article, are precise, and, where possible, supported by evidence. Where necessary, comments should also include a proposed solution.

5000 character(s) maximum

Member 3:

No objection is raised to the overall objective of the draft RTS. However, the draft would benefit from a clearer horizontal statement of principle to ensure that its requirements are applied in a proportionate and sector-sensitive manner across all categories of obliged entities.

Rationale

The consultation paper explains that the draft RTS are intended to be proportionate, risk-based and workable across both the financial and the non-financial sectors. At the same time, the current draft does not sufficiently reflect, at the level of general principles, that obliged entities operate under materially different business models, customer interfaces, service structures and regulatory environments. This creates a risk that provisions which may be workable in one sector are interpreted too rigidly in another.

A clearer overarching provision would therefore be helpful to ensure that the requirements in the RTS are interpreted in a way that reflects the nature of the activity, and the product and its complexity, in the way in which the customer relationship is established and managed and the role of the obliged entity within the AML/CFT framework. This would be consistent with the broader structure of Regulation (EU) 2024/1624, which is based on proportionality and on a risk-based approach to customer due diligence.

This point is particularly relevant for non-financial obliged entities. Credit institutions and other financial institutions occupy a distinct position because of their central role in the financial system and the nature of the services they provide. Non-financial obliged entities generally perform a more indirect gatekeeper function and often operate in regulated environments that differ significantly from those of financial institutions. Equivalent AML/CFT outcomes may therefore need to be achieved through means adapted to the nature of the service and the applicable legal and regulatory framework.

This broader concern is also illustrated by specific provisions such as Article 24, which in its current form appears insufficiently adapted to business models involving well-defined and standardized products or services. Although that issue is addressed more specifically in response to Question 2, it also demonstrates the need for a clearer statement of principle at the level of the RTS as a whole. Please see section 3 for drafting proposal (Article 1, amendment)

Member 2:

In addition, existing information held within the same entity or group should be reused to avoid duplication of data collection and unnecessary operational burden.

Section 3 - Additional substantive input

Use this section to provide feedback on specific articles of the draft RTS, in case these were not already covered in your responses to the previous questions.

For each reply, please describe the issue identified, indicating, where relevant, whether it relates to legal certainty, proportionality, technical implementation or other factors. You are kindly asked to provide alternative drafting proposals and to explain why your proposal would be more appropriate.

Do you have any comments on a specific article in the draft RTS? There is no need to repeat comments made in the previous sections of this survey.

- Yes
- No

* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

Member 3:

Section 1: General principles
Article 1 (amended) – Proportionality and risk-based approach

“When applying the requirements set out in this Regulation, obliged entities shall ensure that the measures taken are proportionate to the nature of the activity, the way in which the customer relationship is established and managed, and the role of the obliged entity within the AML/CFT framework. In the case of non-financial obliged entities, equivalent outcomes may be achieved through means adapted to the characteristics of the service and the applicable legal and regulatory framework.”

Such an addition would improve legal certainty, reduce the risk of inconsistent supervisory expectations and better reflect the stated objective that the RTS should function across both financial and non-financial sectors.

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

comments refer to art 4, 6 & 20

Member 1:

Place of birth: Same applies as commented re article 5, this type of information is not currently available in the e-verification solutions today. Art 20, SDD, has also a requirement for obtaining place of birth, should be especially irrelevant in these cases. These are often unavailable or irrelevant for risk assessment. Viable alternative could be to make collection of places of birth risk-based or optional.

Member 4:

In a context where customer identification is conducted almost entirely through digital means, legal constraints prevent the digital collection of certain data points, such as nationality and place of birth. As a result, the gambling sector is placed in a position where it would be required to collect and verify this information through manual processes, including requesting copies of identity documents from customers. This would represent a significant operational and customer-facing burden for the sector, undermining the objective of efficient and secure digital customer due diligence. If such data is to be collected and verified digitally, it is essential that all obliged entities are granted equal and sufficient legal access to the relevant data sources. Without harmonised access rights, digital identification processes cannot function effectively or consistently across sectors.

Do you have any other comments on a specific article in the draft RTS?

- Yes
 No

* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

5

* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

Member 1:

Article 5 – Collection of all nationalities: We believe it is unnecessary for low-risk customers, burdensome and eventually even of limited AML value. In some markets this is not relevant in any risk scenario and it could be seen as discriminatory. Also to note is that with the current e-id verification in most European countries users are not logging these type of details. The question is, will there be any changes to the local e verification solutions so that this type of required information can be collected without manual reach out to customer? If not, then manual collection of this information, "all nationalities" might be misleading and serve no purpose from an AML perspective. In terms of possible alternatives, it could be to require only primary nationality unless risk factors justify collecting more. The RTS does not appear to fully accommodate widely used and reliable national identification solutions that do not rely on traditional identity documents.

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

comments refer to art 6 & 7

Member 1:

Identity verification: The issue for the sector here is that high-assurance eID and document standards are impractical for many operators. What could be proposed is to allow risk-based alternatives such as credit bureau checks or bank verification.

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

Member 1

Article 9 c: Some requirements appear difficult to operationalize in practice. For example, Article 9(c) requires information that may not be accessible to obliged entities in non-financial sectors, as such data is typically held by banks or payment service providers and is not shared.) We were wondering if Article 9(c) is even applicable to non financial obliged entities?

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

18

* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

comments refer to art 18 & 24

Member 1:

Articles 18(e) & 24 – Purpose of relationship: The article do not appear fully adapted to all sectors. In the online gambling sector, the purpose of the relationship is inherently clear—namely participation in games for entertainment. Requiring additional granular information in all cases does not necessarily enhance risk understanding and may lead to the collection of information with limited relevance for ML/TF risk assessment. We would like to highlight that it has been proven that supervisory authorities wish operators to analyse information at onboarding to fully understand the purpose and nature of the business relationship. Moreover, requirement to ask more questions will end the registration process and turn the player to the black market where no questions are asked. If more questions are to be analysed at customer onboarding, they should be specified.

The issue here is being overly detailed for gambling and the purpose is self-evident. We have seen in many cases that AML supervisory authorities do not think that it is. A certain level of expected gambling pattern is expected to obtain for operators to be able to assess the risk with the new registered customer. We would suggest that it is clarified what questions are expected to be asked for our specific sector. Shall info on what type of games are to be played, for what amounts, why...? Too many detailed questions could send the customer away from completing registration and might not be taken seriously.

Questions on deposit limits are not set with much thought or financial consideration. We could suggest to instead allow generalised purpose (e.g. “entertainment”) unless risk factors require more detail.

Member 3:

An amendment would make Article 18 more operational, better align it with the proportionality principle and with Articles 25 and 33 of Regulation (EU) 2024/1624, and improve the effective application of a genuinely risk-based approach.

Article 18 (amended):

“For business relationships involving well-defined and regulated products or services, obliged entities may determine, and where appropriate presume, the purpose and intended nature of the relationship primarily by reference to the characteristics of the product or service requested, the distribution channel and the contractual or regulatory framework, unless specific risk indicators or behavioral deviations require the collection of additional information.”

If AMLA does not consider it appropriate that the same practical approach applies across all obliged entities, the draft RTS should at least provide for differentiated applications to DNFBPs.

This would reflect the proportionality principle and the risk-based nature of the AML/CFT framework. DNFBPs generally do not occupy the same position in the financial system as credit institutions and other financial institutions, and their customer due diligence processes are often shaped by materially different business models, distribution channels and legal environments. The RTS should therefore clarify that, when applied to DNFBPs, the requirements must be interpreted and operationalized in a manner that is proportionate to the nature of the activity and the sector-specific risk profile.

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

Member 1:

19 (3) Automated PEP screening: Imposes tech burden on small operators. A possible alternative could be to permit manual or hybrid screening based on risk and scale.

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

This comment refers to Section 2 and a proposed new article.

Member 3:

Section 2: Information to be collected for identification and verification purposes

Article x (new): Minimum requirements for customer verification

“Where the identity of a natural person has already been verified in accordance with Article 22(6) of Regulation (EU) 2024/1624, separate verification of supplementary identity attributes, including nationality and place of birth, should only be required where this is relevant and proportionate in light of the customer’s risk profile, or necessary to ensure compliance with obligations relating to politically exposed persons, targeted financial sanctions, or other applicable legal or supervisory requirements.”

If AMLA does not consider it appropriate that the same practical approach applies across all obliged entities, the draft RTS should at least provide for differentiated applications to DNFBPs.

This would reflect the proportionality principle and the risk-based nature of the AML/CFT framework. DNFBPs generally do not occupy the same position in the financial system as credit institutions and other financial institutions, and their customer due diligence processes are often shaped by materially different business models, distribution channels and legal environments. The RTS should therefore clarify that, when applied to DNFBPs, the requirements must be interpreted and operationalized in a manner that is proportionate to the nature of the activity and the nature of sector.

Do you have any other comments on a specific article in the draft RTS?

- Yes
 No

* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

5

* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

This comment refers to Section 5 and a proposed new article.

Member 3:

Section 5: Simplified Due Diligence measures

Article x (new): Clarifying recital or interpretative provision regarding the application of Section 5

“When applying simplified due diligence measures in low-risk situations, obliged entities may consider the characteristics of the relevant sector, including whether the product or service is standardized or well defined and subject to a detailed legal or supervisory framework. In such cases, and subject to the obliged entity’s risk assessment, the purpose and intended nature of the relationship, and the extent of any additional information required, may, where appropriate, be determined by reference to the product or service, the distribution channel, the onboarding framework and the applicable regulatory environment, provided that sufficient monitoring remains in place to detect unusual or suspicious activity.”

If AMLA does not consider it appropriate to introduce additional sector-specific simplified due diligence measures at this stage, it would still be helpful to state expressly that Section 5 is intended to allow sector-sensitive application, including for regulated non-financial sectors, where equivalent AML/CFT outcomes can be achieved through proportionate measures adapted to the service model and legal environment. That would improve legal certainty and make it easier for stakeholders to propose further refinements to simplified due diligence in a more targeted and evidence-based manner.

Do you have any other comments on a specific article in the draft RTS?

- Yes
 No

Do you have any comments on the recitals? The recitals are the statements at the start of the draft RTS and are numbered from (1) to (25).

- Yes
 No

Do you have any comments on the Annex in the draft RTS?

- Yes
 No

Section 4 - Overall assessment

* How would you rate the proposals set out in the draft RTS overall?

- Inadequate
 Somewhat inadequate
 Neutral
 Good
 Excellent

Would the implementation of the draft RTS generate any of the following additional costs beyond the adjustments that would be required to implement the rules set out in Chapter III of Regulation (EU) 2024/1624 (customer due diligence)?

This question is aimed at understanding the additional costs stemming from the implementation of these specific draft RTS, rather than the additional costs stemming from the provisions of Regulation (EU) 2024 /1624. We are interested in understanding the additional costs arising from the implementation of the draft RTS for your obliged entity. Please provide your responses with this context in mind.

For this survey, “costs” refer to the financial and resource implications your entity may face in implementing the draft RTS, including both initial setup efforts and ongoing operational commitments. Examples of one-off costs include amending policies and procedures, system upgrades, staff training or consultancy fees. Examples of recurring costs may include additional reporting, monitoring, software subscriptions, or allocation of additional full-time equivalent resources, etc.

Please describe and substantiate the specific costs you foresee when implementing the provisions of these draft RTS.

	Manageable impact	Disruptive impact	No significant additional costs	Not applicable/no information available
One-off implementation costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recurrent costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Thank you very much for your feedback.

Contact

[Contact Form](#)

