



Public-Consultation-Private sector - Art 19(9) AMLR

Fields marked with * are mandatory.

Public Consultation on draft Regulatory Technical Standards on criteria for business relationships, occasional transactions and linked transactions as well as lower thresholds under Article 19 (9) of Regulation (EU) 2024/1624

Objective of the consultation

AML A invites comments on provisions of the draft RTS under Art. 19(9) of Regulation (EU) 2024/1624 and in particular on the specific questions detailed 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 (*) are mandatory. In case 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, 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 of what we ask from you. In particular, refrain 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, the AMLA staff performs a limited screening of all contributions provided for the sole purpose of blocking unauthorised submissions. After this, the replies are made available to the public directly on the 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.

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.

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.

Your details

* This contribution is made by:

An organisation

* Name of the organisation

Spelbranschens Riksorganisation

* Name of representative:

Eva

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* Sector of activity

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 1 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
- Trading in precious metals and stones
- Trading in high-value goods
- Gambling services
- Crowdfunding service providers and crowdfunding intermediaries
- Trading, intermediary trading or storage in 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

* 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).

Public Consultation Questions

Question 1: Do you find the criteria listed in Article 2 of the draft RTS effective to identify **business relationships** properly? If not, could you please indicate why, where possible substantiated by relevant data?

5000 character(s) maximum

SPER supports the criteria set out in Article 2, notably the recognition that registration-based access implies duration. In fully account-based environments, where customer identification and verification are prerequisites, interactions should normally be considered as occurring within a business relationship. This reflects the inherent continuity and traceability of such service models.

Question 2: Do you find the criteria listed in Article 3 of the draft RTS effective to identify **linked transactions** properly? If not, could you please indicate why, where possible substantiated by relevant data?

5000 character(s) maximum

In gambling, multiple customers may legitimately participate in the same event, within the same timeframe and through the same product (e.g. pari-mutuel pools), without any form of coordination or shared control over funds.

Accordingly, participation in such products, including operator-managed syndicate or share-betting arrangements, should not in itself be interpreted as indicative of linked transactions where customers are individually identified and transactions are fully traceable.

Absent such clarification, there is a material risk of generating false positives, thereby reducing the effectiveness of AML/CFT controls and diverting resources from higher-risk scenarios.

SPER further notes that certain indicators, such as shared digital infrastructure (e.g. IP addresses or devices) or assumptions of customers 'operating in concert', are inherently probabilistic. These should therefore not be treated as determinative factors without sufficient corroborating evidence.

Assessments should be based on objective and verifiable indicators of structuring, concealment or attempts to circumvent thresholds, relying on information already available to the obliged entity and not requiring additional data collection beyond what is proportionate and operationally justified.

Question 3: Do you consider it necessary to add additional criteria that should at least be taken into account when considering the different elements of the definition of a **business relationship** to ensure the proper identification of business relationships? If so, could you please indicate which criteria and for which sector(s)?

5000 character(s) maximum

Customer accounts in gambling environments should be recognised as a strong indicator of a business relationship, given the continuous and traceable nature of customer interaction over time.

Question 4: Do you consider it necessary to add additional criteria that should at least be taken into account when considering the different elements of the definition of **linked transactions** to ensure the proper identification of linked transactions? If so, could you please indicate which criteria and for which sector(s)?

5000 character(s) maximum

SPER recommends that, for gambling services, the assessment of linked transactions should primarily focus on activity within the same customer account and on evidence of coordination or structuring behaviour, without prejudice to the broader set of indicators in the RTS.

Question 5: Do you consider the criteria for identifying **business relationships** and **linked transactions** listed in Article 2(3) and Article 3(2) of this draft RTS proportionate? If not, could you please indicate why, where possible substantiated by relevant data, and which alternative criterion you would find more proportionate?

5000 character(s) maximum

SPER considers that this question is not directly applicable to gambling services, as the referenced provisions primarily concern other sectors. For gambling, proportionality should be assessed through the application of Articles 2(1), 3(1) and 3(3), taking into account fully traceable, account-based environments.

Question 6: Do you foresee any **operational challenges** in implementing this draft RTS? If so, could you please indicate which, where possible substantiated by relevant data? Do you have any suggestions that would make the criteria better suited operationally?

5000 character(s) maximum

SPER identifies potential operational challenges in the interpretation of concepts such as 'acting in concert', 'same purchase' and 'same provider', which may lead to divergent application across Member States.

To ensure operational feasibility and consistent application across Member States, assessments should rely exclusively on information already available to the obliged entity and should not entail additional data collection requirements beyond what is proportionate.

Question 7: Do you see a need for the introduction of an **additional lower threshold** for a specific obliged entity, sector or transaction? If so, could you please indicate why, where possible substantiated by data, and at which value the threshold should be set?

5000 character(s) maximum

SPER agrees that there is no need for additional lower thresholds, particularly in environments where customer identification is mandatory and all transactions are traceable, thereby mitigating the risk of threshold circumvention.

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

Contact

[Contact Form](#)