Contribution ID: 80bcbd4c-df89-4d74-a9d2-17da57d08b36
Date: 18/09/2026 09:32:18

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

Spelbranschens Riksorganisation/Swedish Gambling Association

* 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)

* 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
* [x] Non-Financial Sector
* [ ] Other (please specify)

* Non-Financial Sector

- [ ] Crowdfunding service providers and intermediaries
- [ ] Investment migration operators
- [ ] Non-financial mixed activity holding companies
- [ ] Persons trading in precious metals and stones (as a regular or principal activity)
- [ ] Persons trading in high-value goods (as a regular or principal activity)
- [ ] Persons trading/intermediating in the trade of cultural goods (including art galleries, auction houses)
- [ ] Persons storing/trading/intermediating in the trade of cultural goods and high value goods within free zones and customs warehouses
- [ ] Football agents
- [ ] Professional football clubs
- [ ] Credit intermediaries for mortgage and consumer credit (other than credit institutions)
- [ ] Lawyers and other independent legal professionals
- [ ] Notaries
- [ ] External accountants
- [ ] Auditors
- [ ] Tax advisors
- [ ] Trust and company service providers
- [ ] Estate agents
- [x] Provider of gambling services

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)

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)?

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

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

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

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)

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:

Data points classified as technically required should allow an appropriate "not applicable" or "unknown" treatment where the information does not exist or the data point is not relevant to the business model. A technically inapplicable data point should not prevent the timely submission of a suspicion report.

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?

- ○ Yes
- ○ No (please provide explanation)

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

- ◉ Yes (please provide explanation)
- ○ No

* Explanation

The definition of “transaction record” is primarily framed around payment accounts, IBAN accounts, crypto-asset transfers and money or value transfer services. We would welcome clarification on how the provision of transaction records should apply to gambling services, including wagers, deposits, withdrawals, player-account activity and session-based land-based gambling.

The phased approach is welcome. However, the final implementation period should be based on the outcome of the FIUs’ gap analysis and a realistic assessment of the data mapping, system development, validation, testing and governance changes required from obliged entities. Sufficient time should be allowed between the finalisation of the data model, technical specifications and national implementation requirements and the date on which obliged entities must implement the changes. SPER is not in a position to provide a more precise timeframe without such information.

Further clarification is needed on the meaning of “mandatory if available”. It should be made clear that a data point only needs to be reported where the information is already available to the obliged entity at the time of reporting. This classification should not, in itself, create an additional obligation to collect, obtain or investigate information beyond what is available through the obliged entity’s ordinary business operations and AML/CFT processes.

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
- ● The country-specific data points pose challenges (please provide explanation)

* Explanation

FIU-required data points may be necessary in limited circumstances but should be used restrictively and only where a clearly demonstrated national need exists. Such additions should be transparently justified, proportionate and introduced through a predictable change-management process. They should not duplicate harmonised data points or create unnecessary divergence and implementation costs for obliged entities operating across jurisdictions.

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	

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4	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	

5	◯ 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	

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 - Providers of gambling services	DP0810	Definition	Gambling specific terminology: Sper would welcome further clarification of the gambling-specific data points DP0810–DP0812. In particular, the ITS should clearly distinguish between funds deposited, gross stakes/turnover, winnings, withdrawals/payouts and net losses. The same funds may be wagered repeatedly and gross gambling turnover may therefore materially exceed the amount of funds actually introduced by the customer.
2	Annex 1 - Providers of gambling services	DP0811	Definition	Gambling specific terminology: Sper would welcome further clarification of the gambling-specific data points DP0810–DP0812. In particular, the ITS should clearly distinguish between funds deposited, gross stakes/turnover, winnings, withdrawals/payouts and net losses. The same funds may be wagered repeatedly and gross gambling turnover may therefore materially exceed the amount of funds actually introduced by the customer.
3	Annex 1 - Providers of gambling services	DP0812	Definition	Gambling specific terminology: Sper would welcome further clarification of the gambling-specific data points DP0810–DP0812. In particular, the ITS should clearly distinguish between funds deposited, gross stakes/turnover, winnings, withdrawals/payouts and net losses. The same funds may be wagered repeatedly and gross gambling turnover may therefore materially exceed the amount of funds actually introduced by the customer.
4	Annex 1 - Providers of gambling services	DP0501	Definition	Further clarification is needed on how the “Account” category should be applied to gambling services that do not maintain a persistent player account. Certain land-based gambling models operate on a session basis, with no balance retained between sessions. The ITS should provide an explicit “not applicable” or equivalent treatment for such business models.

5	Annex 1 - Providers of gambling services	DP0007	Definition	Further guidance is needed on the distinction between a Suspicious Transaction Report (STR), a Suspicious Activity Report (SAR), and a report combining both categories. This is particularly relevant for gambling services, where a suspicion may arise from a combination of payment flows, gambling patterns and behavioural indicators. Sector-specific guidance would support consistent classification and reporting practices across obliged entities and Member States.
6	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		Category Sub-category Name of the datapoint Definition Treatment Dependency	

	◯ Annex 1 - Football agents and professional football clubs ◯ Annex 2 - Banking ◯ Annex 2 - Money remittance ◯ Annex 2 - Correspondent banking ◯ Annex 2 - CASPs			
7	◯ 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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8	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	
	Annex 1 - Financial institution and credit institutions			

9	◯ 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		◯ Category ◯ Sub-category ◯ Name of the datapoint ◯ Definition ◯ Treatment ◯ Dependency		

	Annex 2 - Correspondent banking Annex 2 - CASPs				
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Contact

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