

Public Hearing on the draft RTS on CDD

24 March 2026

Policy on Private Sector Standards Unit

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Welcome

Rikke-Louise Ørum Petersen, *Executive board member*

Agenda



Welcome

Rikke-Louise Ørum Petersen – *Executive Board Member*



Presentation on the draft RTS on CDD

Introduction to AMLA and RTS



Exchange of views

Floor opened for views from the audience

House keeping

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Introduction to AMLA

AMLA's role



AML/CTF Supervision

Direct supervision of some of the most impactful credit and financial institutions (40) and **indirectly supervising** the rest

Oversight and coordination of supervisory authorities in the **non-financial sector**

Coordination and Support of EU FIUs

Support in cooperation and joint analyses by national FIUs

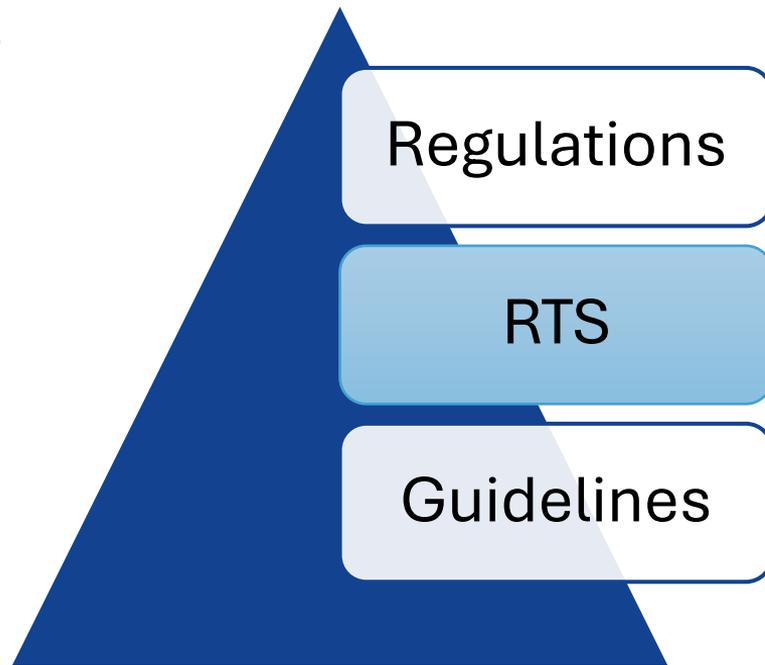
Regulator

Technical standards and guidelines addressed to obliged entities, supervisors and FIUs

What are Regulatory Technical Standards?

Purpose: supplement certain elements of EU law, to ensure consistent practices and uniform application

- Key features:
 - Cannot change the AMLR
 - Legally binding
 - Adopted by European Commission



Draft RTS on CDD

AMLA's mandate

Article 28(1) of Regulation (EU) 2024/1624 requires AMLA to prepare draft RTS specifying:

- (a) Customer due diligence requirements and the information to be collected for simplified, standard and enhanced due diligence;
- (b) The type of simplified due diligence measures that may be applied;
- (c) The risk factors associated with features of electronic money;
- (d) The reliable and independent sources of information to verify the identification data;
- (e) The attributes which electronic identification methods and qualified trust services must feature to comply with identification and verification requirements.

The draft RTS: from EBA to AMLA



AMLA's overarching principles

- Ensure a high level of **harmonisation**.
- Preserve and promote the **risk-based approach**.
- **Proportionality**.
- **Focus on simplification**.
- **Technological neutrality**.
- **Continuity** of the regulatory framework.



AMLA's approach

- ensures that the draft RTS remain silent where the AMLR **is sufficiently detailed**;
- ensures that the draft RTS **continue to allow flexibility** by setting out options obliged entities can consider when deciding on the most effective and proportionate measures;
- **confine modifications to the EBA's text where duly justified**, for example, where AMLA saw a need to enhance or add to an RTS provision proposed by the EBA to ensure a **wider applicability to both the financial and the non-financial sector**; and
- **balance the need to ensure continuity** and **respecting the agreement reached** among competent authorities and the EBA, while ensuring the draft RTS reflect AMLA's mandate and accountability, as well as the views of its stakeholders.
- **invited and considered stakeholder** input NCA's responsible for the financial and the non-financial sector and AMLA's Expert Network. In addition, AMLA liaised closely with the EC and ESMA and engaged with representatives from the financial sector.

AMLA's policy options considered

- Adopting a sector-specific approach, by developing two separate draft RTS for the financial and the non-financial sectors; **or**
- *Adopting a horizontal approach, by issuing one single draft RTS setting flexible, horizontal provisions, complemented with limited, targeted sector-specific measures only where necessary.*
- *Retaining the draft RTS proposed by the EBA with targeted and limited amendments where necessary; **or***
- Using the draft RTS proposed by the EBA as a baseline for reopening discussions and proposing substantive amendments.



Key changes to the draft RTS

Targeted enhancements to the EBA's draft RTS, to ensure applicability to the non-financial sector, further strengthen clarity and reduce unnecessary burdens.

Consultation exercise will shed light on any further adjustments needed.

Applicability to the NFS:

Additional sources of information to understand the nature of the envisaged activities - *Article 18 on purpose and intended nature*

Strengthen clarity and streamline provisions:

- Article 12 on understanding the ownership and control structure of the customer in the case of complex corporate structures
- Alignment with level 1 requirements – *Article 19 on PEPs*

Simplification and burden reduction:

- Encouraging obliged entities to consider how existing information can be reused - *new Recital 21*
- Risk-based approach towards bringing existing customer files in line with the new rules - *Article 33 on entry into force*

Next steps

- 8 May: end of public consultation
- Assessment of all responses and update cost-benefit analysis
- Q3 2026: Submission to the European Commission
- Publication by European Commission



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