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John Berrigan
Director General
Directorate-General for Financial Stability,
Financial Services and Capital Markets Union (FISMA)
European Commission
Rue de Spa 2 1049
Brussels Belgium

30 October 2025

Subject: EBA response to the Call for Advice of 12 March 2024 on certain draft regulatory standards and guidelines to be developed by AMLA

Dear Mr Berrigan,

In your letter to the EBA of 12 March 2024, you issued a Call for Advice ('CfA') on certain regulatory technical standards (RTSs) and guidelines under the new anti-money laundering and countering the financing of terrorism (AML/CFT) framework¹. You asked the EBA to prepare this advice to support the work of the new Authority for Anti-Money Laundering, AMLA. I am pleased to attach the EBA's response, which is set out in the enclosed report.

The report sets out the rationale that underpinned the EBA's approach. It also contains the EBA's proposals for four draft RTSs, a summary of feedback obtained during the public consultation on those proposals, the EBA's assessment of the impact of those proposals, and the options AMLA may wish to consider when preparing an additional two mandates.

The EBA's work on these deliverables was guided by the principles of a proportionate, risk-based approach that focuses on effective, workable outcomes. Where possible, the EBA built on existing standards to streamline regulatory frameworks and limit disruption, and pursued maximum harmonisation across supervisors, Member States and sectors.

In line with these principles, the EBA:

- Worked to ensure that the requirements introduced by the draft RTSs are proportionate and that any costs are duly justified. For example, following the public consultation and a data collection exercise involving 100 institutions, the EBA reduced the number of data points feeding into the risk assessment methodology by approximately 15%. Most institutions will

¹ Including the draft RTS under Article 40(2) AMLD6, the draft RTS under Article 12(7) AMLAR, the draft RTS under Article 28(1) AMLR, the draft RTS under Article 53(10) AMLD6, the Guidelines under Article 53(11) AMLD6 and the draft RTS under Article 16(4) AMLR.

not provide more than 100-150 data points as a result, which is significantly below what is currently requested in EU Member States on average. The EBA also proposed that the same data points be used to inform both supervisors' entity-level risk assessment and the assessment to be performed by AMLA for the purpose of the selection of directly supervised entities. This means that obliged entities will only be required to report one set of data points that can be used for the purpose of both assessments.

- Introduced flexibility and options where this was warranted and in line with the level 1 text. For example, the RTS on CDD does not prescribe specific documents but instead defines the type and nature of information to be collected by obliged entities. A dedicated mechanism was also included in the risk assessment methodology to allow supervisors to reflect national specificities, with certain limitations, so that comparability of risk assessment outcomes remains assured at Union level.
- Introduced transitional provisions in several draft RTS to give sufficient time to institutions or supervisors to adjust their systems and controls in a meaningful way, without compromising the robustness of the EU's AML/CFT system. For example, the EBA proposed that certain data points, which feedback from the sector suggests may be challenging to obtain initially, should not be used for the first selection of directly supervised obliged entities. It also proposed that obliged entities should be able to update the CDD information they hold on existing customers on a risk-based approach, prioritising higher ML/TF risk business relationships in the first instance.

The EBA looks forward to cooperating with AMLA in the future. It remains committed to maintaining the integrity of the EU financial system and stands ready to support AMLA as it takes up its functions.

Yours sincerely,

José Manuel Campa

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Encl: EBA response to the Call for Advice of 12 March 2024 on certain draft regulatory standards and guidelines to be developed by AMLA