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Date: 07/09/2026 10:37:59

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

Wirtschaftsprüferkammer

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

100 character(s) maximum

Norman

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

100 character(s) maximum

Geithner

* Email (note that your email address will not be published)

100 character(s) maximum

berufsrecht@wpk.de

* 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
- [x] Auditors
- [ ] Tax advisors
- [ ] Trust and company service providers
- [ ] Estate agents
- [ ] 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)

* Justification of assessment as Disruptive

Der vorliegende ITS enthält Vorgaben zu den Berichtsformaten und -inhalten. Ausführungen dazu, dass das Meldeverfahren geändert wird, können wir nicht erkennen. In der Folgenabschätzung unter 5.1. zum „Geltungsbereich“ heißt es dazu, dass der Aspekt der technischen Umsetzung ausgeklammert wurde. In Deutschland ist goAML für die Abgabe von Verdachtsmeldungen vorgeschrieben. Daran sollte sich auch nichts ändern, denn es ist im Interesse der EU-Mitgliedstaaten/der FIUs, dass Verdachtsmeldungen abgegeben werden. Kosten dürfen bei Wirtschaftsprüfern nicht entstehen.

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)?

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

If you expect increase or decrease, please estimate the percentage change in ongoing costs compared to the current situation.

- ( ) <5
- ( ) 6-10
- ( ) 11-20
- ( ) 21-30
- ( ) 31-50
- ( ) 51-75
- ( ) 76-100
- (x) >100 (increase only)

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
- [x] Other (please specify)

* Specification of Other

Wenn die Änderungen in goAML eingepflegt werden und die FIUs die Kosten übernehmen, besteht Einverständnis hierzu.

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

- [x] 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:

- [x] 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)
- [x] Fully disagree (please provide explanation)

* Explanation:

> Wie auch bisher im System goAML sind zu viele Datenpunkte vorhanden, die als „obligatorisch“ bzw. „technisch erforderlich“ vermerkt sind. Dadurch wird es Verpflichteten des Nichtfinanzsektors äußerst schwer gemacht, sinnvolle Verdachtsmeldungen abzugeben, da Ihnen bestimmte Angaben einfach nicht vorliegen, da sie durch Ihre (punktuelle) Tätigkeit keinen vollständigen Überblick über den (verdeckten) Sachverhalt haben. Dies trifft insbesondere auch auf den Katalog I.6. für Wirtschaftsprüfer zu.

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?

- [x] Yes
- [ ] No (please provide explanation)

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

- [ ] Yes (please provide explanation)
- [x] No

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
- [x] The country-specific data points pose challenges (please provide explanation)

* Explanation

Im grenzüberschreitenden Kontext kann dies zu Inkongruenzen führen. Allerdings dürfte dies nur bei den wenigsten Fällen zutreffen.

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 - Auditors, external accountants, tax advisors, lawyers, TCSPs	sufficiently comprehensive	sufficiently clear	Alle Datenpunkte zu „Konten“ und zu „Transaktionen“ müssen bei Wirtschaftsprüfern generell auf „optional“ gestellt sein. Im Nichtfinanzsektor, jedenfalls bei Wirtschaftsprüfern, spielen Transaktionen in der Regel keine Rolle, weil sie regelmäßig keine Transaktionen für die Mandanten vornehmen.
	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			

2	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	
	Annex 1 - Financial institution and credit institutions			

3	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	fully comprehensive sufficiently comprehensive minor adjustments needed major adjustments needed	fully clear sufficiently clear minor adjustments needed major adjustments needed		

	Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs			
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	fully comprehensive sufficiently comprehensive minor adjustments needed major adjustments needed	fully clear sufficiently clear minor adjustments needed major adjustments needed	

	◯ 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			
	◯ Annex 1 - Financial institution and credit institutions ◯ Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions			

5	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 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0003	Definition	Wirtschaftsprüfer müssen sich bei goAML registrieren. Wieso wird hier zusätzlich die Registernummer abgefragt? Diese ist bekannt. Überflüssig!
2	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0017	Treatment	Dieses Feld darf nicht „technisch" erforderlich", sondern muss „fakultativ" sein. Oft wird diese Einschätzung gar nicht getroffen werden können. Es wird nur der Verdacht einer rechtswidrigen Handlung vorliegen.
3	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0019	Treatment	Dieses Feld darf nicht „technisch" erforderlich", sondern muss „fakultativ" sein. Oft wird das „Startdatum der analysierten Transaktionen oder Aktivitäten" (so die Definition des Datenpunktes) nicht bekannt sein.
4	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0401	Treatment	Dieses Feld darf nicht „technisch" erforderlich", sondern muss „Obligatorisch, sofern verfügbar" sein. Ob die Informationen anderen Akteuren bekannt sind, ist nicht zwingend bekannt.
5	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0501	Treatment	Dieses Feld darf nicht „technisch" erforderlich", sondern muss „Obligatorisch, sofern verfügbar" oder besser „optional" sein. Bei Sachverhalten, die Wirtschaftsprüfern begegnen, muss nicht zwingend ein Konto eine Rolle spielen.

6	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0601	Treatment	Dieses Feld darf nicht „Obligatorisch“ sein, sondern muss „Optional“ sein. Im Nichtfinanzsektor, jedenfalls bei Wirtschaftsprüfern, spielen Transaktionen in der Regel keine Rolle, weil sie regelmäßig keine Transaktionen für die Mandanten vornehmen.
7	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0605	Treatment	Dieses Feld darf nicht „Obligatorisch“ sein, sondern muss „Optional“ sein. Im Nichtfinanzsektor, jedenfalls bei Wirtschaftsprüfern, spielen Transaktionen in der Regel keine Rolle, weil sie regelmäßig keine Transaktionen für die Mandanten vornehmen.
8	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0607	Treatment	Dieses Feld darf nicht „Obligatorisch“ sein, sondern muss „Optional“ sein. Im Nichtfinanzsektor, jedenfalls bei Wirtschaftsprüfern, spielen Transaktionen in der Regel keine Rolle, weil sie regelmäßig keine Transaktionen für die Mandanten vornehmen.
9	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0608	Treatment	Dieses Feld darf nicht „Obligatorisch“ sein, sondern muss „Optional“ sein. Im Nichtfinanzsektor, jedenfalls bei Wirtschaftsprüfern, spielen Transaktionen in der Regel keine Rolle, weil sie regelmäßig keine Transaktionen für die Mandanten vornehmen.
10	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0609	Treatment	Dieses Feld darf nicht „Obligatorisch“ sein, sondern muss „Optional“ sein. Im Nichtfinanzsektor, jedenfalls bei Wirtschaftsprüfern, spielen Transaktionen in der Regel keine Rolle, weil sie regelmäßig keine Transaktionen für die Mandanten vornehmen.
11	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0616	Treatment	Dieses Feld darf nicht „Obligatorisch“ sein, sondern muss „Optional“ sein. Im Nichtfinanzsektor, jedenfalls bei Wirtschaftsprüfern, spielen Transaktionen in der Regel keine Rolle, weil sie regelmäßig keine Transaktionen für die Mandanten vornehmen.
12	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0617	Treatment	Dieses Feld darf nicht „Obligatorisch“ sein, sondern muss „Optional“ sein. Im Nichtfinanzsektor, jedenfalls bei Wirtschaftsprüfern, spielen Transaktionen in der Regel keine Rolle, weil sie regelmäßig keine Transaktionen für die Mandanten vornehmen.

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Contact

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