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Consultation on the draft ITS on the format for reporting suspicions and providing transaction records

[Consultation on the draft ITS on the format for reporting suspicions and providing transaction records - Authority for Anti-Money Laundering and Countering the Financing of Terrorism](#)

Overall impact

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

While we support greater harmonisation, we seek opportunities to reduce, rather than increase, administrative burdens. The proposed ITS introduces a large number of mandatory and technically required data points that appear disproportionate for accountants. Several requirements do not reflect the information typically available to accountants and may delay or hinder SAR reporting, increasing costs without a commensurate improvement in effectiveness.

The proposed ITS requires significant one-off investments to adapt reporting processes to the new format. The proposed framework combines CDD information and reporting data that may be maintained in different systems and handled by different teams or individuals. Bringing these data together for reporting purposes would require organisational changes, process redesign and coordination. Costs are expected to arise from IT and tooling changes, updates to internal AML/CFT policies and procedures, staff training, implementation guidance, and the resources needed to assess, collect and map the large number of required data points. Given the scope, amount and nature of the requirements, not only implementation, but also the ongoing reporting process is expected to be resource-intensive, particularly for non-financial obliged entities.

We support simplification, proportionality and risk-based supervision. AMLA should therefore reassess the necessity and added value of the proposed data points, remove non-essential requirements and make more fields optional or mandatory only where the information is available. This would reduce unnecessary compliance burdens while preserving the effectiveness of suspicious activity reporting.

Koninklijke Nederlandse
Beroepsorganisatie
van Accountants



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

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
- ☐ >100 (increase only)

Question: 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)**

Specification of Other

The main cost drivers relate to data availability and implementation capacity, particularly for SMEs and non-financial obliged entities. Given the significant increase in the number of data points, including combinations of CDD and reporting data that may be collected, maintained and processed by different teams and systems, a structural increase in the time required to prepare and submit a report can be expected. It is also questionable whether some of these additional data points, for example related to CDD, materially contribute to the assessment of a suspicious activity report. This creates a risk that the growing administrative burden will raise the threshold for reporting, potentially discouraging or delaying SAR submissions. Smaller firms are likely to face disproportionate implementation challenges due to limited resources, expertise and budget, resulting in significant compliance burdens.



Question: 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

Question: 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)

Question: 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:

We support harmonisation in this area. However, the number of data points required to be submitted is so extensive that it may negatively impact the efficiency and effectiveness of the reporting process. This is particularly relevant where certain data points do not appear necessary for an FIU's assessment of a SAR/STR, for example the date on which the client was onboarded.

Furthermore, the approach makes insufficient distinction between data available for financial institutions and other OEs. Many mandatory and technically required data points assume access to transaction and account data that accountants typically do not hold. This creates disproportionate administrative burdens and may delay or prevent SAR submissions where information is unavailable. AMLA should better align requirements with the information available to non-financial OEs and make non-essential fields optional.

Question: 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)**

Explanation:

We support the objective of developing different templates for different categories of obliged entities. However, professionals should be grouped based on the type of information they typically hold and their reporting capabilities. For example, accountants and tax advisers generally have access to similar information, whereas this is less evident for other professions currently included in the same template, such as trust or company service providers. We therefore recommend grouping entities according to their activities, data availability and AML/CFT risk profiles, improving proportionality and reducing unnecessary administrative burden. We also refer to our comments on the individual data points for specific examples.



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

- **Yes (please provide explanation)**
- No

Explanation:

The definition of "*reporting of suspicions*" in Article 2 of the ITS differs from Article 69 AMLR in two respects.

First, Article 69 AMLR requires reporting where an obliged entity **knows, suspects or has reasonable grounds to suspect** that funds or activities are linked to criminal activity or terrorist financing. The ITS definition refers only to **knowledge or suspicion** and does not include **reasonable grounds to suspect**.

Second, the ITS expands the scope by explicitly referring to transactions and any **type of behaviour**, whereas Article 69 AMLR refers more generally to **funds or activities**. Although the recitals to the AMLR do refer to behaviour, we recommend using the terminology set out in the legal provision (article 69 AMLR) to ensure consistency and legal certainty.

Third, Recital 10 states that OEs and FIUs remain responsible for complying with applicable data protection rules, including the principles of purpose limitation and data minimisation.

However, this would require every FIU and OE to separately assess whether each proposed data point is GDPR-compliant. This would create significant duplication of effort, legal uncertainty, implementation costs and administrative burden.

We urge AMLA to assess and demonstrate the GDPR compliance, necessity, and proportionality of each proposed data point and publish the results. For example for the data points related to personal data on prospective customers. Data points for which compliance

with data minimisation and purpose limitation cannot be clearly demonstrated should be removed.

Data point impact

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

While recognising that FIUs may require additional information to address specific national risks, country-specific data points should remain exceptional and strictly justified. Excessive national deviations risk undermining harmonisation, increasing compliance costs, creating legal uncertainty and adding operational complexity. Any additional data points should therefore be limited to information already available to obliged entities and demonstrably necessary for FIU analysis.

AMLA developed templates adapted to various types of obliged entities (see Annexes I and II of the Draft ITS and Interpretative Note).

Question: 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?

	Select 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	Auditors	Fully comprehensive	Fully clear	While we support the objective of greater harmonisation, many proposed data points appear disproportionate for accountants and provide limited value for ML/TF prevention or FIU analysis. The volume of data points, combined with extensive use of technically required and mandatory fields, creates significant administrative burden and implementation challenges. Several requirements do not
		Sufficiently comprehensive	Sufficiently clear	
		Minor adjustments needed	Minor adjustments needed	
		Major adjustments needed	Major adjustments needed	



reflect the data typically available to accountants and may even hinder timely reporting where information is unavailable.

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 data-point 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 (category, sub-category, name of data-point, definition, treatment, dependency):	The body of the comment
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REPORT

Auditors	DP0002	Dependency	Comment:
	For obliged entities performing different activities, indication of the activity related to the report.		Data point DP0002 requires to give an indication of the activity related to the report. This data point is not sufficiently tailored to the accountancy profession. The categories "Certified Accountant" and "Auditor" do not provide a comprehensive or universally recognised classification of accountancy services across Member States.
	Mandatory if available		Proposal We recommend replacing or supplementing the current categories with a more representative classification of accountancy services, including audit and assurance, accounting and bookkeeping, compilation of financial statements, tax services, payroll services, transaction advisory and forensic services. This would better reflect

the activities of accountants across Member States and improve the relevance and consistency of reporting. Also, the term "**statutory auditor**" as mentioned in EU legislation, can be used to refer to professionals performing statutory audits of financial statements. This would be a clearer and more consistent term, particularly as it is already recognised and defined in EU law and more closely reflects the role of external auditors in the Netherlands.

DP0013 Treatment

Indication whether the report concerns a transaction or an activity carried out by the reporting entity through the freedom to provide services in the EU. Update def with XBR def

Comment:

It is unclear what is intended by data point DP0013 and why this information needs to be reported separately. The purpose and added value of this data point should be clarified.

Proposal:

If DP0013 is retained, it should be made optional. Information should only be reported where it is relevant and already available to the reporting entity.

Technically required

DP0016 Treatment

Specific indicators or red flags that triggered the suspicion

Comment:

DP0016 assumes the existence of standardised suspicion indicators for accountants. To date, such indicators do not exist for the AMLR. In addition, this data point appears duplicative, as DP0015 already requires a detailed description of the grounds for the report and the reasons for suspicion.

Proposal

Remove DP0016. Alternatively, if retained, it should be optional. The narrative description provided under DP0015 should be sufficient to explain the basis for the report.

Technically required

DP0017 Treatment

Type of possible criminal offence: ML, TF, PF, Other

Comment:

DP0017 is technically mandatory and requires the reporting entity to classify the type of possible criminal offence as ML, TF, PF or "other". Accountants are generally not qualified



Technically required

to make a legal determination of the underlying criminal offence. Furthermore, the category "other" appears inconsistent with the scope of the framework, which focuses on money laundering, terrorist financing and sanctions-related concerns.

Proposal:

Remove DP0017. Alternatively, if retained, it should be optional. Accountants should not be required to make a legal qualification of the suspected offence as part of the reporting process. The narrative description provided under DP0015 should be sufficient to explain the basis for the report.

DP0018

Treatment

Type of possible underlying criminal offence (e.g., Drug trafficking, Tax fraud)

Comment:

DP0018 requires the reporting entity to classify the type of possible underlying criminal offence (e.g. drug trafficking, tax fraud). Accountants are generally not in a position to determine the nature of the underlying predicate offence and should not be expected to make such legal assessments. Requiring such a classification may lead to inconsistent and unreliable reporting.

Proposal:

Remove DP0018. Alternatively, if retained, it should be optional and include an "unknown" category. Accountants should be able to report suspicions without having to identify or classify the underlying criminal offence. The narrative description provided under DP0015 should be sufficient to explain the basis for the report.

Mandatory if available



DP0019

Treatment

Start date of analysed transactions or activities

Comment:

DP0019 requires the *start date of analysed transactions or activities* and is technically required, even where the suspicion arises from a single document, a single act, or a non-transactional event. It is unclear what the relevance or added

Technically required

value of this data point is in such cases. In addition, where a period of analysis can be identified, this information would typically already be described in DP0015. The requirement therefore risks creating duplicate reporting and unnecessary administrative burden for obliged entities.

Proposal:

Remove DP0019. Alternatively, it should only be mandatory if available, e.g. where a meaningful analysis period can be established. Where relevant information is already provided in DP0015, duplicate reporting should be avoided.

Comment:

The same comment of DP0019 applies to DP0020, which requires the *end date of analysed transactions or activities* and is technically mandatory.

Proposal:

Remove DP0020. Where the relevant information is already provided in DP0015, duplicate reporting should be avoided.



DP0020 Treatment

End date of analysed transactions or activities

Mandatory if available

DP0022 Description

Label attached to the case reported for the purpose of identification or to give other information.

Mandatory if available

Comment:

It is unclear what type of labels are expected and how OEs should apply them in a consistent manner. Without further standardisation, this data point may lead to divergent interpretations and reduce the comparability of reports.

Proposal:

AMLA should provide a predefined list of labels through a standardised drop-down menu. This would promote consistency, harmonisation and data quality across reporting entities and Member States.

DP0023 Treatment

Indication whether an action has been taken regarding the suspicion reported

Comment:

The content of DP0023 is requested three times: at report level (DP0023), natural person level (DP0126) and legal entity

Technically required

level (DP0222), creating significant duplication and administrative burden. The data point appears primarily relevant to financial institutions, as accountants generally identify suspicious activities retrospectively and cannot suspend transactions or freeze accounts. Moreover, not all actions that may ultimately be taken are known at the time of reporting, as reports must be submitted without undue delay. In the exceptional circumstance where such information is relevant, it would already be included in the narrative description under DP0015.

Proposal

Remove DP0023. Alternatively, make it optional and avoid duplicate reporting across report, person and entity level unless different actions are genuinely relevant.

DP0024

Treatment

Description of the action taken regarding the suspicion reported.

Mandatory

Comment:

The same concern applies as for DP0023. Any relevant actions taken would normally already be described in DP0015. Requiring the same information again creates duplicate reporting and additional administrative burden without a clear contribution to ML/TF prevention or FIU analysis.

Proposal:

Remove this data point. Alternatively, make it optional and avoid duplicative reporting where the information has already been provided in DP0015.



NATURAL PERSON

DP0101

Definition

Connection between the natural person and reporting obliged entity

Technically required

Comment:

It is unclear under which circumstances DP0101 is expected to be completed and for which categories of persons it is intended. The scope, purpose and added value of this data point should be clarified to ensure consistent application

by reporting entities.

Proposal:

Clarify the circumstances under which DP0101 must be completed and limit its use to cases where the information is relevant and necessary for FIU analysis. If no clear justification can be provided, the data point should be made optional

At a minimum, where a counterparty is reported, the FIU reporting format should be designed so that only a limited number of data fields are mandatory, given that OEs often have limited information about counterparties.

DP0102 Treatment

Relationship start date

Mandatory

Comment:

It is unclear what the added value of DP0102 (*Relationship Start Date*) is for FIU analysis. The requirement appears to create additional administrative burden without a clear AML/CFT benefit. Furthermore, the data point is also linked to *prospective customers*, for whom a relationship start date may not yet exist and therefore cannot be reported.

Proposal:

Remove DP0102. There does not appear to be a clear AML/CFT rationale for collecting this information, particularly where no business relationship has yet been established.

DP0103 Treatment

Date of termination of the business relationship

Mandatory if available

Comment:

The same concern applies to DP0103 (*Date of Termination of Business Relationship*). It is unclear what added value this information provides for FIU analysis. The data point appears to increase administrative burden without a clear AML/CFT benefit.

Proposal:

Remove DP0103. If retained, it should be optional and only required where the information is readily available and demon-



DP0104	Treatment	Operational status of the business relationship at the date of the report Mandatory if available	strably relevant for FIU analysis. Comment: DP0104 appears ill-suited to the operational model of accountancy firms. The proposed values (e.g. <i>Active, Suspended, Dormant, Blocked, Pending Activation, Pending Closure</i>) seem primarily designed for financial institutions and account-based customer relationships. It is unclear what additional value this information provides for FIU analysis in the context of services provided by accountants. The data point therefore appears to create additional administrative burden without a clear AML/CFT benefit. Proposal: Remove DP0104. The data point does not appear relevant to the accountancy sector and its contribution to FIU analysis is unclear.
DP0105	Treatment	Unique code assigned or allocated by the reporting entity to identify a natural person Mandatory if available	Comment: The added value of DP0105 is unclear. The data point does not appear relevant for accountants and seems unlikely to contribute meaningfully to FIU analysis. Instead, it creates additional administrative burden without a clear AML/CFT benefit. Proposal: Remove DP0105. In our view, the reporting burden associated with this data point outweighs its informational value for FIU purposes.
DP0110	Treatment	The type of identification document(s) used to identify and/or verify the identity of the natural person: identity document, passport or document that meets the requirements laid	Comment: The information covered by this data point may not always be available, particularly in the case of prospective customers. Proposal: This data point should be classified as Mandatory if available, as the relevant information may

down in Article 6(1) of the RTS on CDD (ref. to be added when available).

not always be available, especially for prospective customers.

Technically required/Mandatory if available

DP0111

Treatment

The unique number of the identification document provided by the natural person.

Comment:

The information covered by this data point may not always be available, particularly in the case of prospective customers.

Proposal:

Technically required/Mandatory if available

This data point should be classified as Mandatory if available, as the relevant information may not always be available, especially for prospective customers.

DP0112

Treatment

Country that has issued the identification document

Comment:

The information covered by this data point may not always be available, particularly in the case of prospective customers.

Proposal:

Technically required/Mandatory if available

This data point should be classified as Mandatory if available, as the relevant information may not always be available, especially for prospective customers.

DP0113

Treatment

Date of issuance of the identification document.

Comment:

See our comments on DP0010 and DP0011. The added value of this data point is unclear. While AMLA identifies simplification as a core objective, the large number of proposed data points risks creating significant administrative burden without a clear contribution to ML/TF prevention or FIU analysis.

Proposal:

Technically required/Mandatory if available

Remove this data point, or at a



DP0115	Treatment	minimum make it optional. AM-LA should reassess the necessity and usefulness of all data points and retain only those that demonstrably support effective ML/TF prevention.
Date upon which the identification document expires.		Comment: See our comment on DP0013. The added value of this data point is unclear. While AMLA identifies simplification as a core objective, the large number of proposed data points risks creating significant administrative burden without a clear contribution to ML/TF prevention or FIU analysis. Proposal: Remove this data point or at a minimum make it optional. AM-LA should reassess the necessity and usefulness of all data points and retain only those that demonstrably support effective ML/TF prevention.
Mandatory/Mandatory if available		
DP01222	Treatment	Comment: The added value of this data point is unclear. While AMLA identifies simplification as a core objective, the large number of proposed data points risks creating significant administrative burden without a clear contribution to ML/TF prevention or FIU analysis. Proposal: Remove this data point, or at a minimum make it optional. AM-LA should reassess the necessity and usefulness of all data points and retain only those that demonstrably support effective ML/TF prevention.
Gender indicated on the identification document		
used to identify the person.		
FIU-required		
DP0124	Treatment	Comment: The added value of this data point is unclear. In the exceptional circumstance where this information is relevant, it would already be included in the narrative description provided under DP0015.
Employment status of the natural person as known at the date of the report		
Mandatory if available		Requiring it as a separate data point therefore creates dupli-

cate reporting and unnecessary administrative burden without a clear added value for FIU analysis.

Proposal:

Remove this data point, or at a minimum make it optional. AM-LA should reassess the necessity and usefulness of all data points and retain only those that demonstrably support effective ML/TF prevention.

Comment:

The added value of this data point is unclear. In the exceptional circumstance where this information is relevant, it would already be included in the narrative description provided under DP0015.

Requiring it as a separate data point therefore creates duplicate reporting and unnecessary administrative burden without a clear added value for FIU analysis.

Proposal:

Remove this data point, or at a minimum make it optional. AM-LA should reassess the necessity and usefulness of all data points and retain only those that demonstrably support effective ML/TF prevention.



DP0125

Treatment

Nature of work of the natural person as known at the date of the report

Mandatory if available

DP0126

Treatment

Indication whether an action has been taken regarding the suspicion reported.

Mandatory

Comment:

The content of DP0023 is requested three times: at report level (DP0023), natural person level (DP0126) and legal entity level (DP0222), creating significant duplication and administrative burden. The data point appears primarily relevant to financial institutions, as accountants generally identify suspicious activities retrospectively and cannot suspend transactions or freeze accounts. Moreover, not all actions that may ultimately be taken are known at the time of reporting, as reports must be submitted without undue delay. In the exceptional circumstance

where such information is relevant, it would already be included in the narrative description under DP0015.

Proposal

Remove DP0126. Alternatively, make it optional and avoid duplicate reporting across report, person and entity level unless different actions are genuinely relevant.

Comment:

The same concern applies as for DP0126. Any relevant actions taken would normally already be described in DP0015. Requiring the same information again creates duplicate reporting and additional administrative burden without a clear contribution to ML/TF prevention or FIU analysis.

Proposal:

Remove this data point. Alternatively, make it optional and avoid duplicative reporting where the information has already been provided in DP0015.



DP0127 Treatment

Description of the action taken regarding the suspicion reported.

Mandatory

DP0128 Treatment

Unknown given name(s)

Mandatory if available

Commentaar:

DP0128 to DP0132 require information relating to an *unknown person*. It is unclear why information is requested as *mandatory if available* for an unknown person. If the person is genuinely unknown, no information is available and the fields cannot be completed. Moreover, in the exceptional circumstance where any relevant information is known, it would already be captured in the narrative description under DP0015. These data points therefore appear either unnecessary or duplicative.

Proposal:

Remove DP0128 to DP0132. Alternatively, make them optional and only applicable where specific information is known and relevant to the sus-

DP0129	Treatment	picion. Commentaar: DP0128 to DP0132 require information relating to an <i>unknown person</i>. It is unclear why information is requested as <i>mandatory if available</i> for an unknown person. If the person is genuinely unknown, no information is available and the fields cannot be completed. Moreover, in the exceptional circumstance where any relevant information is known, it would already be captured in the narrative description under DP0015. These data points therefore appear either unnecessary or duplicative. Proposal: Remove DP0128 to DP0132. Alternatively, make them optional and only applicable where specific information is known and relevant to the suspicion.
Unknown family name		
Mandatory if available		
DP0130	Treatment	Commentaar: See our comments on DP0128 and DP0129. The relevance of this data point is even less clear, as it requires, on a <i>mandatory if available</i> basis, an unprecise date of birth for an unknown person. It is unclear what value such information would add to a suspicious activity report or FIU analysis. This data point therefore appears either redundant or of limited practical value. Proposal: Remove this datapoint.
Unprecise birthday date		
Mandatory if available		
DP0131	Treatment	Commentaar: See our comments on DP0128 and DP0129. The relevance of this data point is even less clear, as it requires, on a <i>mandatory if available</i> basis, an estimation of birthday for an unknown person. It is unclear what value such information would add to a suspicious activity report or FIU analysis. This data point therefore appears
Estimation of birthday		
Mandatory if available		

either redundant or of limited practical value.

Proposal:

Remove this datapoint.

Commentaar:

DP0128 to DP0132 require information relating to an *unknown person*. It is unclear why information is requested as *mandatory if available* for an unknown person. If the person is genuinely unknown, no information is available and the fields cannot be completed. Moreover, in the exceptional circumstance where any relevant information is known, it would already be captured in the narrative description under DP0015. These data points therefore appear either unnecessary or duplicative.

Proposal:

Remove DP0128 to DP0132. Alternatively, make them optional and only applicable where specific information is known and relevant to the suspicion.



DP0132 Treatment

Any information available on the unknown person and the relation with primary subjects.

Mandatory if available

DP0134 Treatment

Indication that person is deceased.

FIU-required

Comment:

The added value of indicating whether a person is deceased is unclear, particularly for accountants, as this information will rarely be relevant. If exceptionally relevant to the suspicion, it would already be included in DP0015. Requiring it as a separate data point creates unnecessary administrative burden without a clear contribution to ML/TF prevention or FIU analysis.

Proposal

Remove the data point, or at a minimum make it optional.

DP0135 Treatment

Date of the death.

FIU-required

Comment:

The same comment applies to DP0135 (*Date of Death*). The added value of this information is unclear, particularly for accountants, as it will rarely be

relevant. If exceptionally relevant to the suspicion, it would already be included in the narrative description under DP0015. Requiring it as a separate data point creates unnecessary administrative burden without a clear contribution to ML/TF prevention or FIU analysis.

Proposal:

Remove the data point, or at a minimum make it optional.

LEGAL ENTITY

DP0203	Treatment	Comment:
Risk classification applied by the obliged entity to perform customer due diligence		DP0203 (<i>Risk Classification</i>) appears of limited relevance for a SAR and its necessity is unclear. Also, risk classifications are made with professional judgements, may be more nuanced than a simple low/medium/high scale, can change over time, and may not yet be available for prospective customers. Without additional context, the information may be misinterpreted by FIUs
Mandatory		Proposal
		Remove DP0203. Alternatively, make it <i>optional</i> .
DP0204	Treatment	Comment:
Relationship start date		Same as for DP0102 (natural persons), it is unclear what the added value of DP0204 is for FIU analysis. The requirement appears to create additional administrative burden without a clear AML/CFT benefit. Furthermore, the data point is also linked to <i>prospective customers</i> , for whom a relationship start date may not yet exist and therefore cannot be reported.
Mandatory		Proposal:
		Remove DP0204. There does not appear to be a clear AML/CFT rationale for collecting this information, particularly where no business relationship has yet been established.
DP0205	Treatment	Comment:

Date of termination of the business relationship		Same as for DP0103 (natural persons), it is unclear what added value this information provides for FIU analysis. The data point appears to increase administrative burden without a clear AML/CFT benefit.
Mandatory if available		Proposal: Remove DP0205. If retained, it should be optional and only required where the information is readily available and demonstrably relevant for FIU analysis.
DP0206	Treatment	Comment: Same as for DP0104 (natural persons), this data point appears ill-suited to the operational model of accountancy firms. The proposed values (e.g. <i>Active, Suspended, Dormant, Blocked, Pending Activation, Pending Closure</i>) seem primarily designed for financial institutions and account-based customer relationships. It is unclear what additional value this information provides for FIU analysis in the context of services provided by accountants. The data point therefore appears to create additional administrative burden without a clear AML/CFT benefit.
Operational status of the business relationship at the date of the report		Proposal: Remove DP0206. The data point does not appear relevant to the accountancy sector and its contribution to FIU analysis is unclear.
Mandatory		Comment: The content of DP0222 is requested three times: at report level (DP0023), natural person level (DP0126) and legal entity level (DP0222), creating significant duplication and administrative burden. The data point appears primarily relevant to financial institutions, as accountants generally identify suspicious activities retrospectively and cannot suspend transactions or freeze ac-
Indication whether an action has been taken regarding the suspicion reported.	Treatment	
Mandatory		

counts. Moreover, not all actions that may ultimately be taken are known at the time of reporting, as reports must be submitted without undue delay. In the exceptional circumstance where such information is relevant, it would already be included in the narrative description under DP0015.

Proposal

Remove DP0222. Alternatively, make it optional and avoid duplicate reporting across report, person and entity level unless different actions are genuinely relevant.

Comment:

The same concern applies as for DP0222. Any relevant actions taken would normally already be described in DP0015. Requiring the same information again creates duplicate reporting and additional administrative burden without a clear contribution to ML/TF prevention or FIU analysis.

Proposal:

Remove this data point. Alternatively, make it optional and avoid duplicative reporting where the information has already been provided in DP0015.

DP0223 Treatment

Description of the action taken regarding the suspicion reported.

Mandatory



ADDRESS

DP0301 Treatment

The type of address

Mandatory if available / Optional

Comment:

DP0301 and further requires a large number of address-related data points, while the relevance and added value of many of these fields are unclear. For accountants, collecting and reporting this information may create a significant administrative burden without a clear contribution to ML/TF prevention or FIU analysis. Furthermore, much of the requested information may already be available through official company registries and could potentially be obtained directly by FIUs. If any of this

information is exceptionally relevant to the report, it would already be included in the narrative description under DP0015.

Proposal:

Limit DP0301 to core address information that is demonstrably necessary for FIU analysis and remove non-essential address fields. AMLA should reassess whether information already available from official registries needs to be reported by obliged entities.

Comment:

The same concern as DP0301 applies to DP0302. It is unclear what value is gained by requiring obliged entities to specify the type of street (alley, boulevard, hill, square, neighborhood, etc), particularly as many accountants may not be able to determine this reliably. The extensive list of possible values appears overly detailed and disproportionate for SAR reporting. This creates additional administrative burden without a clear contribution to ML/TF prevention or FIU analysis.

Proposal:

Remove DP0302. Alternatively, make it optional and limit the field to cases where the information is readily available and demonstrably relevant to the suspicion.

DP0302 Treatment

Type of street

FIU-required



DP0303 Treatment

The street and/or post box in which the address is located

See comment DP0301

Mandatory if available / Optional

DP0304	Treatment	See comment DP0301
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The numeric or alphanumeric identifier and/or name of a building or residence

Mandatory if available
/ Optional

DP0305	Treatment	See comment DP0301
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Other useful information

Mandatory if available
/ Optional

DP0306	Treatment	See comment DP0301
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The name of the town, city, suburb or district, or its nearest alternative.

Mandatory if available
/ Optional

DP0307	Treatment	See comment DP0301
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The primary administrative subdivision of a country, such as a state, province, or territory

Mandatory if available
/ Optional

DP0308	Treatment	See comment DP0301
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The alphanumeric code for the postal area

Mandatory if available



/ Optional

DP0309 Treatment See comment DP0301

The country in which
the address is located

Mandatory if available
/ Optional

DP0310 Treatment See comment DP0301

Indication whether
the address is known
as the current ad-
dress or a past ad-
dress.

Mandatory if available
/ Optional

DP0311 Treatment See comment DP0301

Indication of the latest
date when the previ-
ous address was
known by the OE as
the then current ad-
dress of the natural
person or legal entity.

Mandatory if available



CONTACT INFORMATION

DP0312 Treatment **Comment:**

The type of contact
for the natural per-
son, legal entity or
arrangement

Mandatory if available
/ Optional

DP0312, DP0313 and DP0314
appear to request information
that forms part of an obliged
entity's commercial relationship
management rather than infor-
mation relevant to a suspicious
activity report. If relevant, the
information would already be
included in DP0015.

It is unclear why this infor-
mation is needed for FIU analy-
sis or whether its inclusion is
consistent with data minimisa-

tion principles. The data points may also raise privacy concerns and create additional administrative burden without a clear AML/CFT benefit.

Proposal:

Remove DP0312, DP0313 and DP0314. If retained, AMLA should clearly justify their relevance for FIU analysis and assess their compatibility with data minimisation and privacy requirements.

ADVERSE INFORMATION

DP0405 Treatment

Indication whether the person has been identified by the reporting entity as a Politically Exposed Person (PEP), a family member or a close associate of a PEP

Mandatory / Mandatory if available

Comment:

The relevance and added value of DP0405 for a SAR are unclear. It is not evident how this information contributes to FIU analysis in every case. For accountants, PEP information will only occasionally be relevant to the reported suspicion. Where this is the case, it would already be included in the narrative description under DP0015. Requiring it as a separate data point therefore creates additional administrative burden and duplicate reporting.

Proposal:

Remove DP0405. Alternatively, make it optional and only require it where the PEP status is relevant to the reported suspicion.

DP0411 Treatment

Indication of any known negative publicity which is relevant to this report

Conditional

Comment:

The purpose of DP0411 is unclear. While media information may be relevant as context or as a trigger for further review, it should not be treated as evidence supporting a suspicion. It is also unclear what is meant by "negative publicity" and how this concept should be interpreted consistently across OEs. If such information is relevant to the SAR, it would already be included in the narrative description under DP0015. Requiring it separately creates uncertainty and additional administrative burden.



Proposal:

Remove DP0411. Alternatively, make it optional and provide a clear definition of "negative publicity". Only information that is directly relevant to the reported suspicion should be included.

ACCOUNT

DP0501 ev

Treatment

Comment:

Connection between the holder of the account and the reporting obliged entity

Technically required

Data points DP0501 onwards are classified as *technically required*, but they appear to be designed primarily for financial institutions, where suspicious activity is commonly linked to an identifiable account. In the accountancy sector, suspicious activities are often identified retrospectively through client records, and detailed account information may not be available or relevant. Requiring these data points may therefore create unnecessary administrative burden without a clear AML/CFT benefit.

Proposal

DP0501 and subsequent account-related data points should be classified as optional for accountants and other non-financial obliged entities.

DP0503

Treatment

See comment DP0501

Unique code used to identify an account

Mandatory if available

DP0504

Treatment

See comment DP0501

The international bank account number

Mandatory if available

DP0517

Treatment

See comment DP0501



The country where the institution maintaining the account is registered.

Mandatory if available

DP0519

Treatment

See comment DP0501

Indication of any additional information related to the account

Mandatory if available

TRANSACTION

DP0601-0618

Treatment

Comment:

Type or nature of the transaction

Mandatory

Many data points in DP0601-DP0618 are classified as *technically required* or *mandatory*. We would like to emphasise that suspicious activity reports should be capable of being submitted without unnecessary obstacles. If required information is not available, mandatory fields may prevent or delay the submission of a SAR. This is particularly problematic for accountants, who often identify suspicious activities retrospectively and may not have access to all transaction details. Such requirements could ultimately discourage reporting and undermine the effectiveness of the AML/CFT framework

Proposal:

SARs should be capable of being submitted without *technically required* fields. Data points for which information may not be available should be classified as *optional*, ensuring that the absence of specific data does not prevent the reporting of suspicious activities.



PRODUCT & SERVICES

DP0701	Treatment	Comment:
Further details of the type of product or service offered to the customer		The relevance and necessity of DP0701 and DP0702 are unclear. It is not evident how these data points contribute to the assessment of a SAR or support FIU analysis. The requirements appear to be designed primarily for financial institutions and do not align well with the activities of accountants as examples mentioned are managing client money, buying/selling real property, opening or management of bank accounts. Where information on the relevant service or activity is relevant to the suspicion, it would already be included in the narrative description under DP0015. Requiring it separately creates duplicate reporting and additional administrative burden.
Technically required		Proposal:
		Remove DP0701 and DP0702. Alternatively, make them optional and only require completion where the information is directly relevant to the reported suspicion and not already captured in DP0015.
DP0702	Treatment	See comment DP0701
Date on which the product or service was sought or provided		
Mandatory		



NON TRANSACTIONAL ACTIVITY

DP0801	Treatment	Comment:
Details about the nature of the activity(ies) linked to the suspicion being reported.		The relevance and necessity of DP0801 are unclear. The data point appears to overlap with information that may already have been reported elsewhere, creating a risk of duplicate reporting and additional administrative burden. Furthermore, the examples provided in the Inter-

technically required

pretative Note, such as auctions, capital contributions, life annuities, casinos and football clubs, do not appear relevant to the activities typically performed by accountants. If such information is relevant to the suspicion, it would already be included in the narrative description under DP0015.

Proposal:

Remove DP0801. Alternatively, make it optional and limit its application to cases where the information is directly relevant to the reported suspicion and not already captured in DP0015.

DP0802

Treatment

The date and time the suspicious activity occurred or was attempted by the customer or counterparty

Comment:

DP0802 is classified as technically required, although this information is not always available to accountants. Accountants often identify suspicious activities retrospectively through client files, documents or accounting records and may not be able to determine the exact date and time of occurrence. Requiring it may create an unnecessary barrier to reporting.

technically required

Proposal:

Change DP0802 to **mandatory if available**. The absence of an exact date or time should not prevent the submission of a SAR.



OBJECT

DP0901

Treatment

Comment:

Type of object concerned by the transaction or activity reported.

Technically required

DP0901 is classified as *technically required*, although the relevant information may not always be available to accountants. It is important that SARs can be submitted without unnecessary obstacles. Where information on an object is unavailable, a mandatory field could delay or prevent reporting. This would be undesirable and may undermine the effectiveness of the reporting framework.

Proposal:

Make DP0901 optional. The absence of information relating to an object should not prevent the submission of a SAR.