

SHAPING THE FUTURE OF ANTI-MONEY LAUNDERING (AML) STANDARDS – A ROUNDTABLE WITH AMLA

Accountancy Europe, together with FSR – Danish Auditors, on 18 November 2025 hosted [a high-level stakeholder roundtable](#) on the effective implementation of the European Union's (EU) new Anti-Money Laundering (AML) framework, marking the Danish Presidency of the Council of the EU 2025.

The roundtable brought together representatives from the EU Anti-Money Laundering Authority (AMLA), the European Commission, the Danish EU Presidency, and non-financial sector entities, including auditors, accountants, tax advisers, lawyers, and notaries. This wide-ranging participation enabled a rich exchange of practical insights and sector-specific perspectives.

This dialogue enabled stakeholders to share recommendations, highlight operational challenges, and help ensure that future standards reflect the practical realities of the non-financial sector.

Discussions focused on making RTSs and guidance more usable, proportionate, and sector-specific, allowing organisations to target compliance efforts toward the highest-risk areas. Participants explored practical approaches to supervision, risk assessment, and customer due diligence, with particular attention to the challenges faced by smaller firms and cross-border activities.

The roundtable proved to be a highly engaging and constructive platform for discussing how AML RTSs can be tailored to the non-financial sector rather than simply copying rules designed for banks. It marks an important step in the ongoing dialogue, and we look forward to continuing collaboration with our members, AMLA, the European Commission, and non-financial sector representatives to help shape AML standards that are effective, practical, and fit for purpose.

NON-FINANCIAL SECTOR PERSPECTIVES – KEY TAKEAWAYS

Participants emphasised that **RTSs designed for the financial sector cannot simply be replicated for non-financial professions**. Key points raised included:

- **Proportionality and tailored approach:** accountants, auditors, tax advisers, notaries, and lawyers operate differently from banks. Risk-based approaches should allow professional judgement rather than replacing it with prescriptive “tick-box” processes. Overly **burdensome rules risk diverting resources from high-risk cases**.
- **Sector-specific implementation:** Standards should **reflect the day-to-day realities** of non-financial professions particularly smaller firms and differing levels of digitalisation. **Clear and consistent definitions** are needed to ensure that obligations are interpreted in the same way across sectors and Member States.
- **Balancing detail and flexibility in Level 2 and 3 measures:** Work on customer due diligence, business relationships, ongoing monitoring, and sector-specific risk methodologies must ensure rules function in practice. At the same time, Level 2 and 3 measures should **avoid excessive prescriptiveness, preserving the flexibility** needed for **professional judgement** and **risk-based decision-making**. This balance is essential to avoid disproportionate burdens, direct resources toward genuine risk, and to

ensure that the rules can be applied effectively within a professional services environment, rather than being overly calibrated to financial-institution operating models.

- **Implementation support:** RTS and guidelines should be accompanied by **practical implementation tools such as explanatory guidance, FAQs, examples of good practice, and structured opportunities for dialogue** to build a shared understanding across all non-financial professions and supervisory authorities.
- **Leveraging technology:** Digital and AI-enabled tools can help firms address emerging risks and improve efficiency. However, guidance should also **recognise the capacity constraints of smaller practices and provide clarity on what can be outsourced, automated, or supported through technology in a compliant manner**, acknowledging that certain tools (such as AI-enabled transaction monitoring) may be suitable for financial institutions but not effective or proportionate for professional services firms.
- **Making Suspicious Transaction Reporting (STRs) more effective in practice:** Clear, practical guidance is needed to improve the quality and usefulness of STRs and to support consistent application of reporting a suspicion. In particular, guidance should clarify how the concepts of knowledge, suspicion, and reasonable grounds to suspect are to be applied in practice, how indicators of potential criminal activity should be assessed, and when a concern should be escalated to a report. This is especially important for non-financial professions, where existing approaches often reflect financial-sector models and do not always align with professional services activities. The development of **Level 2 and 3 measures and guidance offers AMLA a key opportunity to provide clearer, sector-appropriate guidance to ensure STR obligations are applied in a consistent, workable, and effective manner.**
- **Recognising the role of professionals:** Accountancy, tax, and legal professionals hold essential insights into clients' business models and risk profiles. Their expertise is critical for detecting and mitigating money laundering and should be recognised as **key partners** in shaping AML implementation.
- **Early engagement and ongoing dialogue:** Continuous, structured engagement with stakeholders is essential. **Early feedback helps shape standards that are workable, proportionate, and aligned with the operational realities of non-financial sectors.** Cooperation between AMLA, national authorities, and professional bodies will be crucial for consistent implementation.

LOOKING AHEAD AND NEXT STEPS

- The roundtable highlighted the importance of non-financial sector input in ensuring AML standards are not only technically sound but also practical, proportionate, and fit for purpose.
- Continued dialogue with AMLA, the European Commission, and non-financial sector representatives is key to shaping a robust, workable AML framework.
- Non-financial professionals will continue providing practical insights to ensure AML rules are effective in practice, not just on paper.

USEFUL LINKS

- [*7 principles for AML Regulatory Technical Standards development*](#)
- [*Presentation: AMLA – the EU Anti-Money Laundering Authority \(see “Downloads”\)*](#)