

NICE Actimize

Insights Article

NICE Actimize Response to AMLA's CDD Consultation



AMLA's consultation on the customer due diligence Regulatory Technical Standards closed on 8 May 2026. To supplement our formal consultation response, this article summarises how this fits into the broader package of changes, key aspects of our response and how to keep on top of what happens next.

Where the EU AML Package Stands

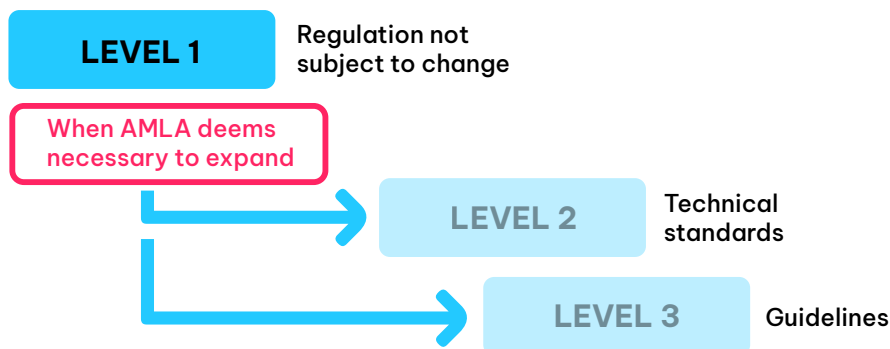
Background

Overhauling the EU's AML framework has been a long-awaited change that, for many, is welcomed because of its potential to reduce divergence between individual member states. The initial proposals were presented by the European Commission in 2021, but it is only throughout 2026 that obliged entities are receiving the level of detail needed to prepare for implementation within their operations.

The package of changes includes a **new EU supervisor**, the Anti-Money Laundering Authority (AMLA) and a **single AML rulebook**, which comes into effect in July 2027.

Importantly, these two changes will be applied through EU regulations that do not require transposition at a national level. This differs from previous AML directives, which have historically not delivered harmonisation due to differences in member states' approaches and in some cases delays.

The new AML rulebook consists of:




Throughout 2026, AMLA is seeking industry feedback on a number of the level 2 technical standards before the final versions are published.

The CDD Consultation

According to [PwC's survey](#) of more than 500 institutions in Europe, Customer Due Diligence (CDD) is the AML control that will be most impacted by the EU AML Package. AMLA has reflected this by running two consultation rounds specifically focused on CDD, the second of which closed on [8 May 2026](#).

The draft CDD RTS has attracted significant attention and analysis since the initial publication and consultation rounds. This is partly due to the widespread impact of changes to CDD, as it provides the foundation for downstream controls such as screening and transaction monitoring. It also reflects the scale and operational significance of the changes AMLA is seeking to introduce.

The rhetoric and supporting commentary surrounding the new rulebook point to a proportionate and principles-based framework.

 The detail however demonstrates that AMLA is setting minimum standards, which, in some areas, are more prescriptive than proportionate. This is not necessarily a criticism of the approach, as it is arguably necessary to achieve the EU's harmonisation objectives. However, it is an important practical consideration for obliged entities.

Many of the consultation responses, including our own, recommend greater flexibility to reduce requirements being disproportionate in certain scenarios. While we expect AMLA to reflect this to an extent, obliged entities should not expect a fundamental restructure and should prepare to adopt these minimum standards.

Response and Recommendations

Broadly, our recommendations focus on where the RTS can be adjusted to clarify or simplify how obliged entities can adopt it operationally.

CDD RTS Topic	RTS Summary	NICE Actimize Response
Simplified due diligence (SDD)	Requires obliged entities to assess risk, including a suite of high-risk factors, before SDD can be applied.	Clarification requested on how firms should assess money laundering or terrorist financing risk without first conducting full CDD, as current wording risks making SDD redundant.
Complex ownership structures	Defines complex structures as those with ≥ 3 layers between customer and beneficial owner plus at least one additional condition (e.g., reduced transparency without legitimate rationale).	View that definition is overly prescriptive and not aligned to a risk-based approach. Suggested reframing to indicators of complexity rather than fixed rules, allowing firms to assess based on context.
Country of birth	Requires collection of country of birth as a data field requirement.	Proposed this should not be mandatory since other jurisdictional data supports risk assessment; recommend a risk-based approach to collecting this data.
Control via other means	Requires identification of parties that own or control customers, including via indirect or non-traditional means.	Highlighted as a key challenge area; recommended additional guidance (not strict prescription) to improve consistency across firms and strengthen compliance outcomes.
Perpetual KYC	Regulation requires periodic reviews and reviews triggered by changes, potentially implying fixed review cycles.	Suggested clarifying that fully perpetual KYC is permissible where controls are in place, as this improves data accuracy and timely risk detection while aligning with risk-based principles.
Entry into force	Regulation applies from 10 July 2027; existing customers must comply by the next periodic review (risk-sensitive basis).	Requested clarification on timing expectations, including when it is acceptable to defer application of new requirements until the next scheduled review.

Why We Participated

NICE Actimize's overarching objective as an organisation is to protect institutions and safeguard consumers' and investors' assets by identifying financial crime, preventing fraud and supporting regulatory compliance. Against this backdrop, we consider it important to contribute practical industry insight to consultations of this nature in support of more effective AML frameworks and financial crime controls.

Given the scale of regulatory change introduced through the EU AML Package, industry engagement will be critical to ensuring that implementation is both operationally effective and aligned to the intended harmonisation objectives.

Day to day, NICE Actimize's work consists of operationalising regulatory requirements for clients. This operational perspective has informed both our engagement with, and feedback to, AMLA.

Additional Resources

- For direct updates from AMLA including published consultation responses: [Homepage - Authority for Anti-Money Laundering and Countering the Financing of Terrorism](#)
- For AMLA's schedule of work: [AMLA sets strategic priorities with 2026-28 Single Programming Document](#)
- For NICE Actimize AMLA Webinar - 23 June 2026: [The EU AML Package: What To Do Now](#)

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About NICE Actimize

As a global leader in artificial intelligence, platform services, and cloud solutions, NICE Actimize excels in preventing fraud, detecting financial crime, and supporting regulatory compliance. Over 1,000 organizations across more than 70 countries trust NICE Actimize to protect their institutions and safeguard assets throughout the entire customer lifecycle. With NICE Actimize, customers gain deeper insights and mitigate risks. Learn more at www.niceactimize.com