

Matheson's AML/CFT Tracker Sheet-by-Sheet Summary



Overview

Matheson's anti-money laundering and counter terrorist financing ("AML/CFT") tracker is a comprehensive inventory and tracking tool that will assist regulated entities with the management of the incoming regulatory instruments that EU authorities - primarily the new Authority for Anti-Money Laundering and Countering the Financing of Terrorism ("AMLA") - are mandated to develop under the EU's landmark AML/CFT reform package (the "Tracker").

The Tracker maps 75 individual mandated instruments across four Level 1 texts, tracking their status, deadlines, and thematic focus. The 75 instruments are sorted into 13 themes, each described with reference to the relevant Level 1 Articles. This allows firms to identify the areas of greatest regulatory intensity and prioritise their monitoring and preparedness accordingly. Customer due diligence, supervisory cooperation, and crypto/funds transfer traceability are some of the key dominant areas of focus in the Tracker.

The Tracker includes a colour-coded heatmap plotting the intensity of expected regulatory publication activity month-by-month from 2024 through to 2030. The cell is colour-coded to reflect the number of regulatory milestones (statutory deadlines and publication events) falling in that month, ranging from no activity to peak activity. This provides an immediate visual sense of when the regulatory burden will be most intense, enabling firms to plan resources, compliance reviews, and legal advisory support well in advance.

The centrepiece of the Tracker is a detailed, line-by-line catalogue of all 75 mandated instruments. This is the single most practical resource that will assist compliance teams, for example, in identifying which rules will apply to them, the related timelines and key items which will need to be monitored.

Finally, the Tracker includes a single-page illustration of the reform timeline; with the concentration of 19 mandates on 10 July 2026 is a particularly important near-term milestone for the industry. The structured reference table listing every distinct statutory deadline in the Tracker, with the count of instruments due on each date and the relevant articles, provides the definitive deadline reference for compliance planning purposes.

From 1 January 2026, AMLA took over all AML/CFT tasks previously held by the European Banking Authority ("EBA"). Existing EBA guidelines and standards remain valid under a transitional provision (Article 54(5) of AMLAR) until AMLA issues replacements. The Tracker maps these legacy instruments to the relevant new mandates.

The Tracker draws exclusively on the text of the Level 1 legislation, AMLA's official website (including its Regulatory Instruments and Public Consultations pages) and the EBA's website. It therefore consolidates publicly available information all in one place.

The Tracker: Illustrative Example One:

The Tracker includes a sheet that defines eight possible status categories and counts how many of the 75 instruments fall into each category (as at 30 June 2026); with the aim of providing an at-a-glance snapshot of the overall state of progress in the regulatory programme, making it immediately apparent how much of the reform EU AML/CFT package remains outstanding.

Status	Meaning
Final report published	Draft finalised by AMLA and submitted to the Commission for adoption
Published / In force	Instrument already published and currently operative
Consultation closed	Public consultation has ended; AMLA is analysing responses

Status	Meaning
Consultation open	Written consultation currently accepting submissions
Not published	Mandate exists in the Level 1 texts but nothing has yet appeared on AMLA's website
Not in force	Instrument envisaged but not yet concluded or brought into force
N/A	Optional Commission power; no fixed deadline applies
Blank/ not yet determined	Row added but status not yet populated

The Tracker: Illustrative Example Two:

The Tracker includes a matrix table showing, for each of the four Level 1 texts, how many of each instrument type have been mandated. This illustrates that the AMLR and AMLD6 are by far the most prolific sources of mandated instruments. The predominance of Guidelines (29) and ITS (17) - both of which are supervisory in character - signals that significant supervisory-level detail remains outstanding at this stage.

Level 1 Text	RTS	ITS	Guide-lines	Joint Guide-lines	Delegated Acts	MOUs	Recommendations	Opinion	Report	Total
AMLAR	2	2	0	0	2	3	0	0	0	9
AMLR	4	6	12	1	5	0	0	0	0	28
AMLD6	7	9	7	0	1	0	2	1	1	28
FTR	0	0	10	0	0	0	0	0	0	10
Total	13	17	29	1	8	3	2	1	1	75



Disclaimer

Whilst every effort has been made to ensure the accuracy of the information/material contained in the Tracker, Matheson LLP assume no responsibility for the accuracy, completeness and/or up to date nature of the information provided therein and does not accept any liability whatsoever arising from any errors or omissions. The contents of the Tracker are provided as an information guide only for the reader. The Tracker is current as of the date of its publication and will be updated from time to time; but the Tracker does not necessarily reflect the present state of the law or relevant regulation.