

<b>3rd AML Directive (2005/60/EC)</b>	
<i>(No response)</i>	
<b>Procedural stage</b>	<b>Member States</b>
<b>Letter of formal notice to 22 Member States for non-communication of national transposition measures within the deadline</b>	AT, BE, BG, CZ, DE, EL, ES, FI, FR, IE, LT, LU, LV, MT, NL, PL, PT, RO, SE, SL, SK and UK.
<b>Reasoned opinion to 13 Member States for failure to implement the Directive into national law</b>	BE, DE, EL, ES, FI, FR, IE, LU, MT, NL, PL, PT and SE.
<b>Referral to the European Court of Justice (6 Member States)</b>	BE, ES, FR, IE, PL and SE (no ruling against PL - case withdrawn from register)
<b>Letters of formal notice over 3 Member States failure to execute the judgements of the ECJ (article 260 TFEU)</b>	ES, FR and IE
<b>Complaints concerning incorrect transposition of the 3rd AML Directive: reasoned opinion</b>	DE (Mecklenburg-Vorpommern and Sachsen-Anhalt Bundesländer have not appointed supervisory authorities to real estate agents, insurance intermediaries and providers of goods, when payments are made in cash in excess of €15 000)
<b>Complaints concerning incorrect transposition of the 3rd AML Directive: exchange of correspondence</b>	BG (obligations of payment institutions)
<b>Implementing Directive (2006/70/EC) on PEPs and exemptions on grounds of a financial activity conducted on an occasional or very limited basis</b>	
<b>Procedural stage</b>	<b>Member States</b>
<b>Letter of formal notice to 22 Member States for non-communication of national transposition measures within the deadline</b>	AT, BE, BG, CZ, DE, EL, ES, FI, FR, IE, LT, LU, LV, MT, NL, PL, PT, RO, SE, SL, SK and UK.
<b>Reasoned Opinion to 15 Member States for failure to implement Directive 2006/70</b>	BE, CZ, DE, EL, ES, FI, FR, IE, LU, MT, NL, PL, PT, SE and SK.
<b>Decision to refer 6 Member States to the ECJ</b>	BE, ES, FR, IE, PL and SE (no ruling against PL and SE - these cases were withdrawn from register)
<b>Letters of formal notice over 3 Member States failure to execute the judgements of the ECJ (article 260 TFEU)</b>	BE, FR and IE

**Regulation (EC) No 1781/2006 on information on the payer accompanying transfers of funds**

[The Regulation provides for the obligation of Member States to lay down effective, proportionate and dissuasive penalties in national law - and to notify there to the Commission]

Procedural stage	Member States
Letter of formal notice to 11 Member States for <u>non-communication</u> of national transposition measures within the deadline	CZ, ES, FI, IE, IT, MT, PL, PT, RO, SE and SL,
Reasoned opinion to 2 Member States for failure to implement the Directive into national law	ES and PL
Referral to the European Court of Justice (None)	ES ( <i>complied before judgement - no ruling</i> )

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## Over view of infringement measures 3<sup>rd</sup> AML/CTF package

### Overview - by MS - (\* = complaint)

#### CELEX references:

32005L0060 : 3rd AML Directive (2005/60/EC)

32006L0070 : Implementing Directive (2006/70/EC) on PEPs and exemptions on grounds of a financial activity conducted on an occasional or very limited basis

32006R1781: Regulation (EC) No 1781/2006 on information on the payer accompanying transfers of funds

Hyperlinks to Commission's press releases can - when issued - be found in the table

	MS	Act - (Celex ref.)	Delay	LFN	RO	Ref to ECJ	LFN2	Days open
1	AT	32005L0060	Yes	Yes				261
		32006L0070	Yes	Yes				261
2	BE	32005L0060	Yes	Yes	<u>Yes</u>	<u>Yes</u>		779
		32006L0070	Yes	Yes	Yes	Yes	Yes	779
3	BG	32005L0060	Yes	Yes				233
		32006L0070	Yes	Yes				233
		32005L0060*	No					PSD (32007L0064)- no LFN
4	CZ	32005L0060	Yes	Yes				233
		32006L0070	Yes	Yes	Yes			233
		32006R1781	Yes	Yes				300
5	DE	32005L0060	Yes	Yes	<u>Yes</u>			261
		32005L0060*	Yes	Yes			Complaint	458
		32006L0070	Yes	Yes	Yes			261
6	EL	32005L0060	Yes	Yes	<u>Yes</u>			261
		32006L0070	Yes	Yes	Yes			261
7	ES	32005L0060	Yes	Yes	Yes	Yes	Yes	856
		32006L0070	Yes	Yes	Yes	Yes	Yes	856
		32006R1781	Yes	Yes	<u>Yes</u>	<u>Yes</u>		909
8	FI	32005L0060	Yes	Yes	<u>Yes</u>			513
		32006L0070	Yes	Yes	Yes			513
		32006R1781	Yes	Yes				300
9	FR	32005L0060	Yes	Yes	<u>Yes</u>	<u>Yes</u>	Yes	975
		32006L0070	Yes	Yes	Yes	Yes	Yes	639
14	IE	32005L0060	Yes	Yes	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	877
		32006L0070	Yes	Yes	Yes	Yes	Yes	877
		32006R1781	Yes	Yes				300
11	IT	32006R1781	Yes	Yes				300
12	LT	32005L0060	Yes	Yes				233
		32006L0070	Yes	Yes				303
13	LU	32005L0060	Yes	Yes	<u>Yes</u>			233
		32006L0070	Yes	Yes	Yes			233
14	LV	32005L0060	Yes	Yes				233
		32006L0070	Yes	Yes				233
15	MT	32005L0060	Yes	Yes	<u>Yes</u>			233
		32006L0070	Yes	Yes	Yes			233
		32006R1781	Yes	Yes				300
16	NL	32005L0060	Yes	Yes	<u>Yes</u>			230
		32006L0070	Yes	Yes	Yes			230

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Over view of infringement measures 3<sup>rd</sup> AML/CTF package

17	PL	32005L0060	Yes	Yes	<u>Yes</u>	<u>Yes</u>	659
		32006L0070	Yes	Yes	Yes	Yes	385
		32006R1781	Yes	Yes	<u>Yes</u>		573
18	PT	32005L0060	Yes	Yes	<u>Yes</u>		233
		32006L0070	Yes	Yes	Yes		233
		32006R1781	Yes	Yes			300
19	RO	32005L0060	Yes	Yes			233
		32006L0070	Yes	Yes			233
		32006R1781	Yes	Yes			300
20	SE	32005L0060	Yes	Yes	<u>Yes</u>	<u>Yes</u>	513
		32006L0070	Yes	Yes	Yes	Yes	513
21	SK	32005L0060	Yes	Yes			233
		32006L0070	Yes	Yes	Yes		233
22	SL	32005L0060	Yes	Yes			233
		32006L0070	Yes	Yes			233
		32006R1781	Yes	Yes			62
23	UK	32005L0060	Yes	Yes			233
		32006L0070	Yes	Yes			233