



## Circular letter

Delay in the AML/CFT  
standardised data collection

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## Delay in the AML/CFT standardised data collection

**To the Management Board and the Board of Directors of all:**

- **Credit institutions;**
- **Investment firms;**
- **Investment fund managers including registered AIFMs, Luxembourg branches of investment fund managers, SIAG, FIAAG and investment funds which did not designate an investment fund manager;**
- **Payment institutions and electronic money institutions;**
- **Virtual Asset Service Providers**
- **Crypto Asset Service Providers; and**
- **Central Securities Depositories**

**incorporated under Luxembourg law.**

**To all Luxembourg branches of the above-listed entities having their registered office in an EU country or a third country.**

Luxembourg, 6 March 2026

Ladies and Gentlemen,

The Commission de Surveillance du Secteur Financier (CSSF) would like to inform you that as a consequence of ongoing developments on the AML/CFT questionnaire template and interpretative guidance at the level of the Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA), the launch of this year's AML/CFT standardised data collection campaign by CSSF, which had been announced for 2 March, has to be further delayed.

AMLA received a very high number of comments from the sampled industry participants who have received a draft questionnaire template and interpretative guidance for consultation. The authority is currently reviewing these comments and working on incorporating the relevant feedback into an updated version of the reporting documents.

At this stage, AMLA has not clarified how long this review and implementation process in total will take.

In light of these circumstances, the CSSF expects the campaign to proceed as following:

A significantly updated, however **not final version** of the questionnaire **can be found in the Annex to this Circular letter for your information purposes only. This is not the file which should be filled out and submitted**. However, you can start **preparing** your data collection based on this draft version ahead of submission. As this is **not the version of the Questionnaire which should be submitted**, eDesk will remain closed for the data collection campaign until the final version will become available.

At this time, AMLA maintains the submission **deadline of 15<sup>th</sup> of April for the sampled entities**. Should there be any changes, the CSSF will communicate on this.

The CSSF will distribute the **final version of the questionnaire once it becomes available from AMLA. The submission deadline for the non sampled entities will be adjusted.** As the exact timing of the finalised questionnaire by AMLA remains uncertain, the CSSF will communicate the new deadline at a later stage.

AMLA will organise a **dedicated webinar on Friday 13 March 2026 from 10:00 to 12:00** to present the reporting framework and provide key clarifications.

The connection details to the AMLA organised webinar can be found in the Annex. Due to technical limitations, the number of participants to the live event will be limited to 1 000 (on a first come first served basis). **The live Webex event will be recorded and uploaded on AMLA's website shortly thereafter.**

The CSSF will continue to keep all stakeholders informed of further developments as soon as additional information becomes available.

**Claude WAMPACH**  
Director

**Marco ZWICK**  
Director

**Jean-Pierre FABER**  
Director

**Pascale TOUSSING**  
Director

**Claude MARX**  
Director General

## ANNEX



Reporting\_Templat  
e\_V2.xlsx



Interpretative\_Note  
\_V2.docx



AMLA - Webinar  
with entities.msg

*We recommend that you use a desktop to access the annexes via the attachments pane (paper clip icon) as mobile and tablet may not be supported.*