

# Commission: Germany, Portugal, and Romania Failed to Correctly Transpose 4th AMLD

## News

**Thomas Wahl**

In February 2021, the Commission formally [initiated infringement procedures](#) against Germany, Portugal, and Romania for having incorrectly transposed the 4th Anti-Money Laundering Directive ([Directive \(EU\) 2015/849](#)). As an initial step, the Commission sent a letter of formal notice requesting further information to each of the countries. The Commission stressed that it will not tolerate legislative gaps that may have an impact on the effective fight against crime and the protection of the financial system.

The Commission alleges that the countries have not addressed fundamental aspects of the anti-money laundering framework, including:

- The proper exchange of information with Financial Intelligence Units (FIUs);
- Requirements of customer due diligence;
- The transparency of the central beneficial ownership registers.

Germany, Portugal, and Romania have two months to provide a satisfactory reply to the points raised by the Commission. Otherwise, the Commission may launch the second step of the infringement procedure by addressing a [reasoned opinion](#) to the countries.

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