

Directive (EU) 2024/1640 Focus: Article 18 & Recitals

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Relevant recitals — legal rationale (summary)

- Real estate is highlighted as attractive for money laundering because ownership can be obscured (beneficial owner) (63)
- SAPs reduce obstacles to timely identification, enable machine-readable access, and support cross-border cooperation. (63)
- Historical transaction data is important for detecting suspicious patterns (63)
- The accuracy of data included in the central registers is fundamental (27)

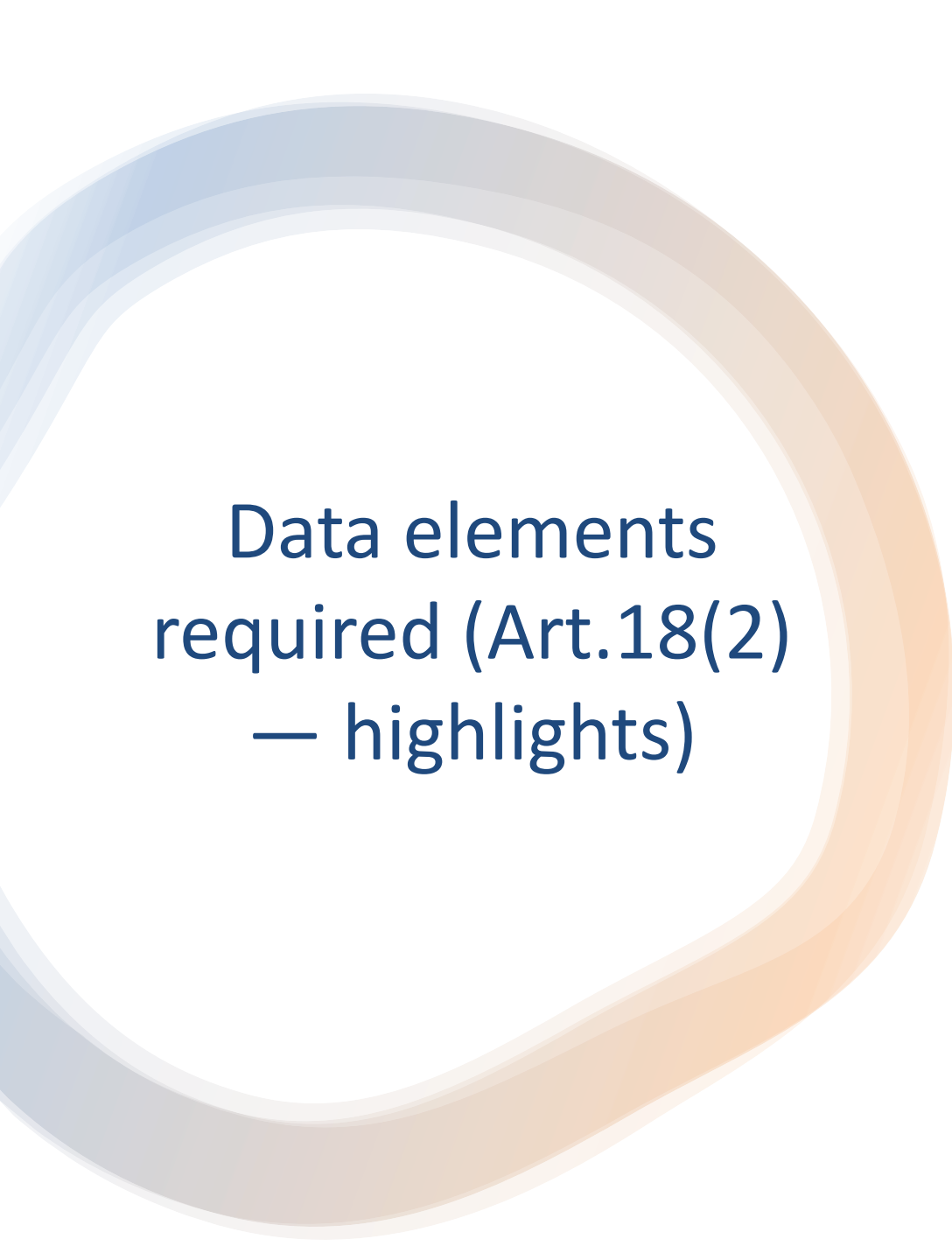
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Why Article 18 matters

- Creates a Single Access Point (SAP) for LR data for competent authorities.
- Aimed to improve detection, analysis and cross-border cooperation on ML/TF risks involving real estates.
- Connects FIUs, competent authorities and AMLA for joint analyses.

Scope & Core obligation (Art.18 – paraphrase)

- Member States must ensure access to info for AMLA:
 - Immediate,
 - direct,
 - Free of charge,
 - Via electronic means (machine readable where possible)
- Access must be provided through a national Single Access Point



Data elements required (Art.18(2)) — highlights

- Property info: cadastral reference, location/address, size, type/use.
- Ownership info: owner name, legal form, company ID, tax ID, purchase price, entitlements/restrictions.
- Encumbrances: mortgages, judicial restrictions, property rights, guarantees;
- **History & relevant documents.**

Data elements required (Art.18(2) — highlights)

- **A** – Property info: cadastral reference, location/address, size, type/use.
- **B** – Ownership info: owner's name, legal form, company ID, tax ID, purchase price, entitlements/restrictions.
- **C** - Encumbrances: mortgages, judicial restrictions, property rights, guarantees;
- **History & relevant documents.**





Historical coverage & time lapse

- Historical ownership, price and encumbrance data must cover at least from 8 July 2019. (Last 5 years?)
- Member States must ensure accuracy and timely provision (electronic preferred).
- Up to date info



Access & users

- Access granted to national competent authorities and to AMLA for joint analyses.
- Member States must notify the Commission of SAP characteristics and list of users by 10 Oct 2029.

Commission report & interconnection (Art.18(6))

- By 10 July 2032 the Commission must assess technical specs/secure interconnection of national SAPs.
- Where appropriate, the Commission may submit a legislative proposal after that report.



Implementation & practical challenges

- Previous experience with Directive (EU) 2015/849
 - Technical: standardisation, machine-readability, secure access, data quality.
 - Legal/privacy: balancing access for FIUs/authorities with data protection and legal safeguards.
 - Operational: defining list of competent authorities, costs, and cross-border sharing protocols.

Key takeaways & sources

- Art.18 establishes EU minimum for national SAPs to give authorities immediate access to LR data.
- Timelines: notifications by 10 Oct 2029; Commission assessment by 10 Jul 2032.
- Primary source: EUR-Lex Directive (EU) 2024/1640 (recitals & Article 18).



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systems

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Land Registry Proceeding

This is guidance for describing our LR system as for proceedings; it is a guide containing the main questions for producing a descriptive answer at least for each chapter. This fact sheet is divided into 9...

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Hidden Charges

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- ✓ Avoiding duplicities when opening a new Land Registry File
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 - Status of the Land Registrar
- ✓ Registering Property Rights of Married Persons and Registered Partners
- ✓ COVID-19 : Study on the special measures implemented in the LR in Europe
- ✓ Judicial Restrictions
- ✓ Property Taxes

Contact Point's



Considering your legislation and that AMLA are precisely defined, is your system ready to provide the requested info within 5 working days, free of charge?



Taking into consideration the requested LR info (A,B,C info, history & docs), is your system able to provide it?



**Is your system ready to provide
machine readable info?**



What obstacles do you foresee in providing info as regulated in art. 18?

Thank you for your
attention!